UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

AUG - 8 2011

ACTION MEMORANDUM RV1

DATE:

SUBJECT: Request for a Ceiling Increase, 12-Month Exemption, and $2 Million Exemption for the Removal Action at the Charlestown Mall Site, Village of Frankfort, Herkimer County, New York

FROM: Terry E. Kish, On-Scene Coordinator
Removal Action Branch

TO: Judith A. Enck
Regional Administrator

THRU: Walter E. Mugdan, Director
Emergency and Remedial Response Division

Site ID#: A239

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the Ceiling Increase, 12-Month Exemption and $2 Million Exemption at the Charlestown Mall Site (Site), Village of Frankfort, Herkimer County, New York. This is the first U.S. Environmental Protection Agency (EPA) removal action undertaken at the Site. The objective of this removal action is to mitigate the threat of direct contact posed to the public by asbestos contaminated demolition debris present at the Site. This will be accomplished by completing the removal and off-site disposal of the asbestos contaminated debris. The total funding increase requested in this Action Memorandum is $2,192,000, of which, $1,903,000 is from the Regional removal advice of allowance for mitigation contracting. If approved, the new total project ceiling will be increased to $4,061,000, of which, $3,313,000 is for mitigation contracting. Conditions at the Site meet the criteria for a removal action under the Comprehensive Environmental Resource, Compensation and Liability Act (CERCLA) and Section 300.415(b) of the National Contingency Plan (NCP).

With asbestos being the primary contaminant of concern, at this time, in accordance with EPA policy, concurrence on this Action Memorandum will be sought from the Office of Emergency Management since it qualifies as a nationally significant or precedent setting removal action.

II. SITE CONDITIONS AND BACKGROUND

The Site, located at 2205 Bleeker Street, Village of Frankfort, Herkimer County, New York, is the location of a former manufacturing facility which was occupied by various owners and industries from 1894 through the mid 1970's when manufacturing ceased at the facility. In 1976, the facility was sold and a portion of it was redeveloped into the Charlestown Outlet Complex which operated through 1991 when it became the Charlestown Business Complex. Over the years, a series of buildings at the Site were not properly maintained and became extremely deteriorated. The property was sold in 2006 and again in 2007 when it was purchased by the current owner of the Site, Charlestown Mall of Utica, LLC, which continues to lease storage space within the intact buildings on the property. In early 2008, the New York State Department of Labor (NYSDOL) discovered unpermitted demolition of one of the deteriorated buildings occurring at the Site, which was not in compliance with the National Emission Standard for Hazardous Air Pollutants (NESHAP) for asbestos. In October 2008, the New York State Department of Environmental Conservation (NYSDEC) referred the Site to EPA for assistance in performing a removal site evaluation (RSE). Following the initial RSE conducted by EPA and NYSDEC on November 5, 2008, NYSDEC issued an order to the owner of the facility to address asbestos contaminated debris and polychlorinated biphenyls (PCBs) from the Site. The owner, who claimed to be unable to finance the clean-up, applied for a "Restore New York Grant" in order to come into compliance with the Order. In October 2009, EPA was notified that the grant application for the Charlestown Mall was denied. Subsequently, EPA completed an additional RSE in November 2009 which has confirmed the release of asbestos to the environment and that a time-critical removal action was necessary.

An Action Memorandum was written to address the threats associated with asbestos, PCBs and drums at the Site. The Action memorandum was approved on July 16, 2010 and removal activities were initiated on August 16, 2010. To date, threats associated with the PCBs and drums have been addressed. Deteriorated structures, where asbestos containing materials (ACM) could not be safely removed, have been demolished. The resulting demolition debris, along with demolition debris present from historic demolition has been staged on-site awaiting disposal off-site. The ceiling increase is necessary because disposal costs are higher than originally estimated. The increased cost of disposal is a result of a local solid waste flow control law, which requires that all solid wastes generated within the County be disposed of at a facility operated by the Oneida Herkimer Solid Waste Authority. The disposal cost per unit is higher than what was estimated in the original Action Memorandum.

The Comprehensive Environmental Response, Compensation and Liability Information System Identification Number for the Site is NYC2004000513.

A. Site Description

1. Removal site evaluation (RSE)

On November 5, 2008, NYSDEC Bureau of Environmental Crimes Investigation (BECI) executed a search warrant in order to evaluate asbestos contamination as well as electrical transformers reported to have been damaged as a result of demolition activities. EPA Removal Action Branch (RAB) and Criminal Investigation Division (CID) along with Removal Support Team 2 (RST) assessment personnel assisted BECI in conducting the investigation.

During the investigation, weathered presumed asbestos containing materials (PACM) were identified in the debris at several locations around the Site, and samples of each material were collected for confirmation analysis. The results of the analyses confirmed asbestos to be present in the surface debris at two of seven locations sampled. In addition, ACM (which has fallen off of a pipe and was deteriorated as a result of exposure to weather) was confirmed to be present in the basement of building 13. All observed ACM was friable.

In addition to asbestos, EPA and BECI investigated the potential release of PCBs from electrical transformers as a result of the demolition/salvaging operations which occurred at the Site. Two electrical transformers (which contained approximately 350 gallons of dielectric fluid) were identified in building 15. The tops of these two transformers had been removed, while two other transformers had been overturned, presumably for salvaging purposes. The contents of those transformers (approximately 150 gallons) were released onto the floor of Building 15. A sample of oily debris collected from the floor of the building confirmed the presence of PCBs at a concentration of 44,000 milligrams per kilogram (mg/kg). Samples collected from the intact transformers confirmed the presence of PCBs at concentrations less than 50 mg/kg. An additional oil sample collected by BECI was reported to be 100% Aroclor 1254. In addition, approximately 50 electrical capacitors and/or rectifiers were observed to be present and are presumed to contain PCBs. Several of the capacitors were observed to be leaking, others had been opened and the contents had released onto the floor of the building.

As mentioned above, following this investigation, NYSDEC issued an Administrative Order to the owner of the Site requiring him to remediate the PCBs and asbestos contaminated debris identified at the Site. The owner of the Site stated that he intended to come into compliance with the Order, but would be financially dependent upon a Restore New York Grant for which he had applied. Additional investigation was suspended due to the NYSDEC enforcement action.

In October 2009, EPA was notified that the grant proposal submitted for Charlestown Mall was denied; therefore the owner of the property was financially incapable of performing the clean-up. As a result, NYSDEC asked EPA to resume evaluation of the Site for removal action eligibility. Subsequently, EPA planned an expanded removal

assessment which involved a more thorough evaluation of asbestos contamination within the large volume of demolition debris. This investigation was partially based on information contained in an asbestos survey, which was provided to EPA by the NYSDOL. The survey documented the presence of substantial amounts of friable asbestos present in many of the buildings and former buildings which are now dilapidated or demolished.

The primary area of focus was former Building 3, which has been completely demolished with the exception of some partial exterior walls which remained standing. Once demolished, the debris from this building was compacted into its foundation by tracking over it with heavy equipment. This process pulverized the debris at the surface into mostly small fragments of brick and splinters of wood. During the assessment conducted in November 2008, ACM was only observed at two locations despite searching the entire 25,000 ft^2 of the former Building 3 footprint. The reason for this was assumed to be because either the ACM was buried deeper in the lower levels of the original structure or because any ACM present in the debris at the surface had been pulverized and weathered to a point that it was difficult to discern. In order to determine if the latter was true, EPA and RST mobilized to the Site on November 16, 2009, to initiate the additional assessment. The assessment involved the establishment of ten, 12 feet x 12 feet square sampling locations within the footprint of building 3. The square sampling areas were spaced out evenly throughout the area of pulverized debris at locations which were determined to be safe (outside the shadow of unstable walls), and at locations which seemed to have a variety of debris types present. Once established, the debris within each square was thoroughly searched for potentially asbestos containing fragments. The search was conducted by raking through the top three to four inches of debris, examining small fragments as they were encountered. Each fragment suspected to be friable ACM was collected. Once the search of the 12 foot x 12 foot square was completed, fragments were selected for polarized light microscopy (PLM) asbestos analysis. Asbestos was positively identified in seven of the ten randomly placed grids ranging from <1% to 80% chrysotile.

During the November 2009 assessment the boiler house (aka. Building 6) was found to be unsecured after pieces of equipment had been conspicuously dismantled outside of the building leaving oil stains on the pavement. Inspection of the building confirmed that the building had been subject to scrap metal salvaging and vandalism which had caused the release of dielectric fluid from several transformers within the building. Several drums and small containers were also discovered to be abandoned within the building. Label information on many of the containers indicated that they contained hazardous substances. As a result of the inspection, EPA added the interior of this building to the ongoing assessment. The containers inside the building appeared to originate from when the boiler house operated and included lubricants, chlorinated solvents, acids, oxidizers, and biocides. Several samples from the drums were submitted for Resource Conservation and Recovery Act (RCRA) characteristics laboratory analysis; one drum of liquid was confirmed to have a pH of 13. Other drums of similar material were not submitted for analysis. Three drum samples analyzed for volatile organic compounds identified tetrachloroethylene (PCE) and/or trichloroethylene (TCE) as constituents.

Analysis revealed that one of the drums contains approximately 60% PCE. PCBs were not identified to be present in the transformers which were accessible for sampling; however two large transformers were unable to be sampled. PCBs were identified at a concentration of 41 mg/kg in a drum marked lubricating oil indicating that dielectric fluid had likely been poured into the drum during salvaging. Also, several small buckets and tubs of oil were also observed around the building presumably originating from the salvaging of electrical components.

2. Physical location

The Site (43.089126 latitude, -75.183323 longitude) occupies approximately 14.5 acres, of which approximately 1.7 acres is located in the City of Utica, Oneida County while the remainder is located in the Village of Frankfort, Herkimer County, New York. The Site is situated in a commercial/industrial area, and approximately 400 residences are located within one mile of the Site. To the southwest of the Site is the Masonic Care Community of New York. This facility is a long term care/rehabilitation facility which has capacity for approximately 300 residents. The Masonic Care Community includes a day care center which is situated approximately 500 feet to the southwest of the dilapidated buildings of the Site. Commercial/industrial operations border the Site to the southeast, north and west. At the eastern end of the Site, approximately two acres has been leased and is occupied by a steel fabricating business. The Mohawk River is located approximately one half mile north of the Site. A Site location map and Site layout map are included as Attachment 1.

3. Site characteristics

The Site was comprised of approximately 15 interconnected brick buildings. The buildings in the northeastern half of the Site remain largely intact, some of which are used as rental storage space for tenants while others house small commercial businesses. It appears that the number of commercial tenants is very limited. The southeastern edge of the Site consisted of several partially collapsed or demolished structures. Demolition of the remainder of these structures, which were contaminated with asbestos, was completed as a part of this removal action. A steel fabricating company currently leases a steel building located at the eastern tip of the Site. None of these operations are contributing to the asbestos threat identified at the Site, however when present at the Site, workers and tenants may potentially be exposed to asbestos contaminated debris.

4. Release or threatened release into the environment of a hazardous substance, or pollutant, or contaminant

The Site is defined as a facility under Section 101(9) of CERCLA, 42 U.S.C. § 9601(9), and hazardous substances abandoned at the Site comingled with demolition debris constitute a "release," as defined in Section 101(22) of CERCLA, 42 U.S.C. Section § 9601(22). Sampling and analysis conducted at the Site by EPA has identified the following CERCLA hazardous substance as defined in 40 CFR Table 302.4.

Hazardous Substance	Statutory Source for Designation Under CERCLA
Asbestos	Clean Water Act - Section 307(a) Clean Air Act - Section 112

Asbestos is designated as a CERCLA hazardous substance under 40 CFR Part 302.4 (Table 302.4) and is classified as either friable or non-friable. Friability is the ease with which material can be crumbled, pulverized, or reduced to powder (by hand pressure) when dry. The degree of friability of the ACM determines the potential for fiber release to the air. An assessment which focused largely on the partially pulverized debris compacted into the basement of former Building 3 identified asbestos to be present at the surface throughout the length of the former structure. Samples collected from this area identified chrysotile asbestos to be present at concentrations ranging from <1% to 80%.

An asbestos survey prepared in April 1998, identified asbestos to be present in Buildings 5 and 7, while Building 3 was determined to be unsafe to perform the survey. In Buildings 5 and 7, more than 3,500 linear feet of asbestos containing pipe insulation was identified. This is in addition to the other asbestos containing materials which included 7,000 linear feet of floor tile and mastic, as well as window caulking and glazing throughout the facility. A copy of this asbestos survey is included as Attachment 2. Demolition of these structures has been completed. Disposal of the resulting asbestos contaminated demolition debris is pending.

5. National Priority List (NPL) status

At the present time, the Site is not on the NPL and there are no efforts underway to include the Site on the NPL.

6. Maps, pictures, and other graphic representations

A Site location map and Site layout map are included as Attachment 1.

B. Other Actions to Date

1. Previous actions

In Spring 2009, NYSDEC entered into negotiations with the current owner of the property to address asbestos and PCB contamination at the Site. As a result of that negotiation, the owner applied for a grant to fund the clean-up and re-development of the Site. EPA suspended any further evaluation of the Site while the owner sought funding to perform the clean-up proposed by NYSDEC. In October 2009, EPA was notified that the application for funding was denied. Subsequently, NYSDEC determined that there was no likelihood that the owner would be able to finance the clean-up under an administrative order. Therefore, EPA resumed evaluation of the Site in November 2009, and in January 2010, EPA determined the Site was eligible for a removal action. As a result, EPA decided to perform a CERCLA removal action.

2. Current action

In August 2010, EPA initiated its removal action at the Site to address threats associated with asbestos, PCBs and drums abandoned at the Site. To date, EPA has addressed the threats associated with PCBs and drums containing hazardous substances. Demolition of dilapidated structures where asbestos could not be abated has been completed. Transportation and disposal of the resulting asbestos-contaminated demolition debris is pending approval of this Action Memorandum.

The removal action is expected to continue beyond the statutory time limitation of twelve months for an action to be completed and two million dollars, necessitating this exemption.

C. State and Local Authorities' role

1. State and local actions to date

In a letter dated October 24, 2008, NYSDEC requested that EPA evaluate the Site for eligibility for a time-critical removal action. Before an eligibility determination could be made, NYSDEC entered into negotiations with the current owner of the property to gauge its willingness to address asbestos and PCB contamination at the Site. As a result of that negotiation, the owner applied for a grant to fund the clean-up and re-development of the Site. EPA suspended any further evaluation of the Site while the owner sought funding to perform the clean-up proposed by NYSDEC. In October 2009, EPA was notified that the owner's application for funding was denied and it would not be able to finance the clean-up under a proposed NYSDEC administrative order. Therefore, EPA resumed evaluation of the Site in November 2009. In January 2010, EPA determined the Site to be eligible for a removal action and as a result, EPA decided to perform a CERCLA removal action.

2. Potential for continued State/local response

There are no actions planned or being taken by any State or local government agencies to address the hazardous substances present at the Site other than those discussed above.

III. THREATS TO PUBLIC HEALTH, OR WELFARE, OR THE ENVIRONMENTAL AND STUATORY AND REGULATORY AUTHORITIES

Asbestos is a hazardous substance, as defined by Section 101(14) of CERCLA, listed at 40 CFR Part 302.4 (Table 302.4).

Asbestos mainly affects the lungs and the membrane that surrounds the lungs. Breathing high levels of asbestos fibers for a long time may result in scar-like tissue in the lungs and in the pleural membrane (lining) that surrounds the lung. This disease is called asbestosis and is usually found in workers exposed to asbestos, but not in the general public. People with asbestosis have difficulty breathing, often a cough, and in severe

cases heart enlargement. Asbestosis is a serious disease and can eventually lead to disability and death.

Breathing lower levels of asbestos may result in changes called plaques in the pleural membranes. Pleural plaques can occur in workers and sometimes in people living in areas with high environmental levels of asbestos. Effects on breathing from pleural plaques alone are not usually serious, but higher exposure can lead to a thickening of the pleural membrane that may restrict breathing.

As a result of the release or potential release of asbestos fibers to the atmosphere, the conditions at the Site continue to meet the criteria for a CERCLA removal action as described in the NCP at 40 CFR 300.415(b)(2). The following criteria are directly applicable to the threats which exist at the Site:

(i) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances, or pollutants, or contaminants.

There is a threat to human health posed by the ACM that has been released at the Site. The Site is regularly accessed by workers and tenants who rent storage space at the facility. Tenants accessing certain storage areas must pass immediately beside the asbestos contaminated debris which has been piled next to the access road through the Site. Persons coming into contact with the asbestos could inhale the material or have it deposited on their clothing, and subsequently inhaled. Vehicle traffic using access roads formerly covered by debris may also cause asbestos to be released into the air, threatening workers, tenants, and neighbors of the Site.

EPA's assessment confirmed that ACM is present at the surface of the debris throughout the Site and is currently subject to weathering. Weathering causes the matrix which binds the fibers together to be broken down, releasing the fibers to the environment. Once in the environment, the stable mineral fibers persist and do not readily break down further. Any disturbance of these materials by tenants, workers, or trespassers may cause asbestos fibers to be released to the air.

(iv) High levels of hazardous substances, or pollutants, or contaminants in soils largely at or near the surface that may migrate.

EPA's assessment has confirmed that asbestos containing building materials are present at the surface of the pulverized debris and is subject to constant weathering as a result. Weathering causes the matrix which binds the asbestos fibers together to be broken down, releasing the fibers into the environment. Once in the environment, the stable mineral fibers persist and do not readily break down further. Any disturbance of these materials by tenants, workers, or trespassers may cause asbestos fibers to be released to the air. Runoff from the Site may cause additional migration of these asbestos fibers.

(v) Weather conditions that may cause hazardous substances, or pollutants, or contaminants to migrate or be released.

Asbestos containing building materials are present at the surface of the debris throughout the Site and is subject to weathering as a result. Weathering causes the matrix which binds the asbestos fibers together to be broken down, releasing the fibers into the environment. Once in the environment, the stable mineral fibers persist and do no readily break down further. Several dilapidated structures remaining at the Site contain weathered ACM. High winds traveling through the remaining standing structures, some of which are four stories tall, may cause asbestos fibers to be entrained in the air high above the ground increasing the likelihood of being carried to adjacent areas and posing a risk of exposure.

(vii) The availability of other appropriate federal or State response mechanisms to respond to the release.

EPA is the only government agency capable of taking timely and appropriate action to respond to the threat posed by the presence of hazardous substances at the Site.

IV. ENDANGERMENT DETERMINATION

Actual or threatened releases of hazardous substances from the Site, if not addressed by implementing the response action selected in this Action Memorandum, may present an imminent and substantial endangerment to public health.

V. EXEMPTION FROM STATUATORY LIMITS

The cleanup will exceed the 12-month, $2 million statutory limit because of the large volume of waste requiring disposal and the high cost of that disposal. The increased cost of disposal is a result of a local solid waste flow control law, which requires that all solid wastes generated within the County be disposed of at a facility operated by the Oneida Herkimer Solid Waste Authority. The disposal cost per unit is higher than what was estimated in the original Action Memorandum.

The removal action will continue beyond the one year statutory time limit because of four months of case law research conducted by the Office of Regional Counsel in coordination with EPA Headquarters to determine the applicability of the solid waste flow regulation of Oneida/Herkimer County to federally funded cleanup actions.

A. Emergency Exemption

1. There is an immediate risk to public health or welfare or the environment.

Approximately 13,000 tons of asbestos contaminated debris is present at the Site. ACM exposed to the weather will deteriorate further enabling asbestos fibers to be released into the environment. The asbestos fibers can easily become entrained in wind and surface

runoff causing them to migrate, increasing the potential for workers, tenants and the general public to come into direct contact with the asbestos.

2. Continued response actions are immediately required to prevent, limit, or mitigate an emergency.

The Site has commercial tenants, and space is rented to the general public for storage. Therefore, access into the Site cannot be completely restricted by EPA. Disposal of the asbestos contaminated debris is necessary to prevent workers and tenants from coming into direct contact with asbestos fibers. Continuing the response action by disposing of the asbestos contaminated debris will prevent workers and tenants from coming into direct contact with asbestos fibers and will prevent additional migration of the asbestos fibers.

3. Assistance will not otherwise be provided on a timely basis.

There are no State or local response actions planned to mitigate the threats posed by the Site. The Site was referred to the EPA by the NYSDEC in October 2008. EPA has assumed the lead role in mitigating the threats posed by the Site by implementing the response actions proposed in this memorandum.

VI. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The activities proposed below will be implemented to mitigate the threats to public health at the Site. The removal action is expected to be completed within three months of approval of this Action Memorandum.

- Removal and off-site disposal of ACM removed from existing dilapidated structures and segregated from the debris when possible.
- Segregation and decontamination of scrap metal for recycling.
- Segregation and decontamination of concrete and wood timbers for disposal, as appropriate.
- Off-site disposal of approximately 13,000 tons of asbestos contaminated debris

EPA does not anticipate the need for post-removal Site controls at the completion of the project. Upon completion of the removal action, the property adjacent to the Charlestown Mall property will be assessed to determine if asbestos has migrated to these locations. The results of the assessment will be evaluated to determine if additional cleanup is required.

2. Contribution to remedial performance

The response measures proposed in this Action Memorandum will address the threat of direct contact to asbestos by the public and will contribute effectively to any long-term remedial action with respect to the release or threat of release of asbestos at the Site.

3. Engineering Evaluation/Cost Analysis (EE/CA) (for non-time critical actions only)

Because of the time critical nature of this proposed removal action, an EE/CA will not be prepared.

4. Applicable or Relevant and Appropriate Requirements (ARARs)

ARARs within the scope of this project include RCRA, the Hazardous Material Transportation Act, the Toxic Substance Control Act, and the Clean Air Act'sNational Emissions Standards for Hazardous Air Pollutants. These will be met to the extent practicable as will any additional ARARs identified during the removal activities.

5. Project schedule

Field activities are anticipated to resume in August 2011 and be completed in October 2011.

B. Estimated Costs

The estimated costs for the completion of this project are summarized below. A detailed, confidential independent government cost estimate is included as Attachment 3.

Direct Extramural Costs	Funding Authorized in Action Memorandum signed on July 16, 2010	Additional Funding Requested in this Memorandum	Total Funding Authorized and Requested
Regional Allowance Costs (Total clean-up contractor including labor, equipment and materials)	$1,175,000	$1,730,000	$2,905,000
10% Contingency	$235,000	$173,000	$408,000
Total ERRS Costs	$1,410,000	$1,903,000	$3,313,000
Other Extramural Costs Not Funded From the Regional Allowance	$0	$0	$0
Total RST 2 Costs	$230,000	$90,000	$320,000
Subtotal, Extramural Costs	$1,640,000	$1,993,000	$3,633,000
5% Extramural Cost Contingency	$328,000	$100,000	$428,000
Total Direct Extramural Costs	$1,968,000	$2,192,000	$4,061,000

VII. EXPECTED CHANGE IN THE SITATION SHOULD ACTION BE DELAYED OR NOT TAKEN

If the proposed actions described in this memorandum are not implemented, the threats posed by the Site would persist. The threat posed by asbestos contaminated debris represents a significant threat to human health and the environment. If no actions are taken, ACM will continue to weather and deteriorate releasing asbestos fibers into the environment.

VIII. OUTSTANDING POLICY ISSUES

There is no known outstanding policy issues associated with the Site at the present time.

IX. ENFORCEMENT

The current and former owners of the property claim to be financially incapable of performing the clean-up activities requested by EPA.

ENFORCEMENT COST ESTMATE

The total EPA cost for this removal action, based on full-cost accounting practices that will be eligible for cost recovery, is estimated to be $5,813,138 and was calculated as follows:

COST CATEGORY	AMOUNT
Direct Extramural cost	$4,061,000
Direct Intramural Cost	$135,000
Subtotal Direct Costs	$4,196,000
Indirect costs (Indirect Regional Cost Rate 38.54 %)	$1,617,138
Estimated EPA Costs eligible for Cost Recovery	$5,813,138

This estimate includes direct costs, which include direct extramural costs and direct intramural costs. Indirect costs are calculated based on and estimated indirect cost rate expressed as a percentage of site-specific direct costs, consistent with full cost accounting methodology which became effective on October 2, 2000. These estimates do not include prejudgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of the removal action. The estimates are for illustrative purposes only, and their use in this Action Memorandum may not be relied upon by any third party as binding upon EPA. Neither the lack of a total cost estimate nor deviation of actual costs from this estimate will affect the United States' right to cost recovery.

X. RECOMMENDATION

This decision document represents the selected removal action for the Charlestown Mall Site located in the Village of Frankfort, Herkimer County, New York. This document has

been developed in accordance with CERCLA and is not inconsistent with the NCP. This decision is based on the administrative record for the Site.

The total funding increase requested in this Action Memorandum is $2,192,000, of which, $1,903,000 is from the Regional removal advice of allowance for mitigation contracting. If approved, the new total project ceiling will be increased to $4,061,000, of which, $3,313,000 is for mitigation contracting. There are sufficient monies in the Advice of allowance to fund the project.

Please indicate your formal authorization for the removal action at the Charlestown Mall Site, as per current Delegation of Authority, by signing below.

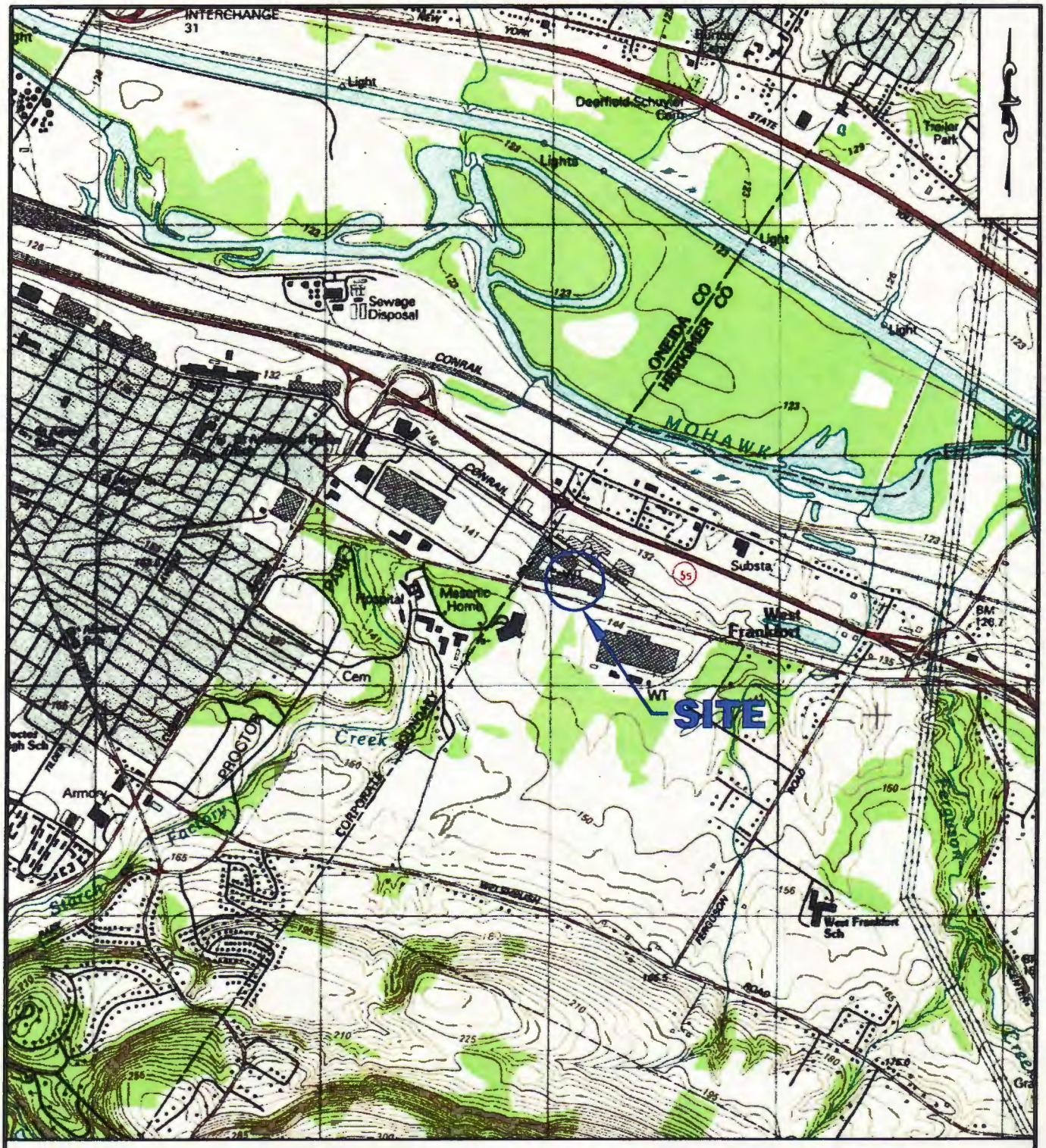
APPROVAL: Judith A. Enck **DATE:** 8/8/11
Judith A. Enck
Regional Administrator

DISAPPROVAL: _____ **DATE:** _____
Judith A. Enck
Regional Administrator

cc: *(after approval is obtained*
G. Pavlou, DRA
W. Mugdan, ERRD-D
J. LaPadula, ERRD-DD
J. Rotola, ERRD-RAB
D. Harkay, ERRD-RAB
B. Grealish, ERRD-RAB
G. Zachos, ACSM/O
C. Peterson, ERRD-NYRB
T. Lieber, ORC-NYCSFB
M. ears, PAD
R. Manna, OPM-FMB
K. Giacobbe, OPM-GCMB
P. McKechie, OIG
T. Grier, 5202G
A. English, NYSDEC
A. Raddant, USDOI
S. Bates, NYSDOH
L. Rosman, NOAA
R. Craig, RST

ATTACHMENT 1

Site Location Map
Site Layout



SOURCE:

NEW YORK STATE GIS, USGS DIGITAL RASTER GRAPHIC QUADRANGLE, EAST UTICA, NEW YORK, 1983 (1: 24,000 SCALE–UTM ZONE 18, NAD 1927)

GRAPHIC SCALE

2000 1000 0 1000 2000

APPROXIMATE SCALE IN FEET

U.S. EPA REMOVAL ACTION
CHARLESTOWN MALL SITE
FRANKFORT, NY

CONCORD NEW HAMPSHIRE

SITE LOCATION MAP

DRAWN	DATE	W.O. NO.
TAC	MAY 2010	20401.115.013
SCALE	REVISION	FIGURE NO.
AS SHOWN	0	1

M:\Design\DWG\START\Charlestown Mall Site\Site Maps.dwg, Locus, 5/14/2010 2:31:30 PM, BARON 1:1

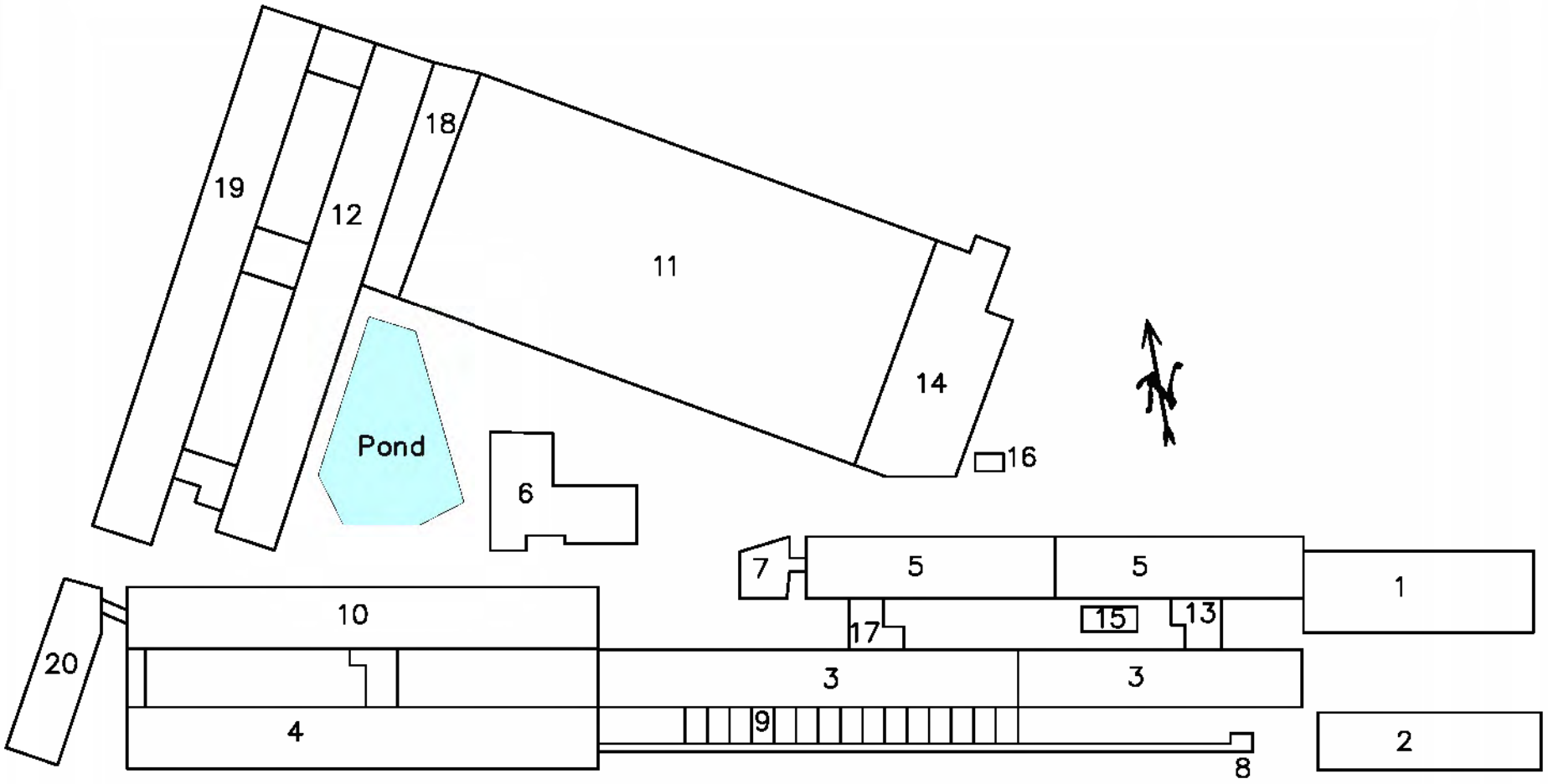


Figure 1 Building Layout Map

Charlestown Mall Site
2205 Bleeker Street, Village of Frankfort, NY

U.S. Environmental Protection Agency,
Region 2
Emergency and Remedial Response Division
Removal Action Branch
2890 Woodbridge Ave, Edison, New Jersey

ATTACHMENT 2

Photographic Documentation

Charlestown Mall Site – Photographic Documentation
Frankfort, NY

View facing East of the eastern half of former Bldg 3 prior to EPA removal activities.

View facing West of the western half of former Bldg 3 prior to EPA removal activities.

Asbestos containing material (ACM) identified in the Building 5 debris.

Asbestos contaminated demolition debris following demolition completed by EPA.

ATTACHMENT 3

Asbestos Survey

ASBESTOS SURVEY REPORT

CHARLESTOWN COMPLEX
UTICA, NEW YORK

Project #8916

Prepared April 1998

Prepared For:

Gaetano Construction
311 Turner Street
Utica, New York 13501

Prepared By:

Jack Eisenbach Engineering, P.C.
291 Genesee Street
Utica, New York 13501

CHARLESTOWN COMPLEX
SURVEY REPORT

PROJECT #8916

The following report is a summary of the asbestos survey performed by Jack Eisenbach Engineering, P.C. (JEE) in connection with the demolition of the Charlestown Complex located in Utica, New York. The buildings scheduled to be surveyed were Buildings 3, 4, 5, 6, 7, 10, 11, 12, 14, 16, and 18.

Four transformer buildings were also surveyed. Transformer Building No. 1 is part of the Boiler House, Building 6; Transformer Building No. 2 is a standalone structure between Buildings 3 and 5; and Transformer Buildings No. 3 and 4 are attached to Building 12.

The inspection was performed and samples were collected by Anthony J. Scialdone (New York State Accredited Inspector, Number AH92-13654) and James S. Wheeler (New York State Accredited Inspector, Number AH89-01165 between February 26 and March 11, 1998.

The survey was performed in accordance with New York State Code Rule 56 regulations. All accessible suspect materials were sampled. Floor tiles laid over wood flooring and roofing materials were not sampled because they can be disposed of as construction debris during the demolition. These materials were assumed to contain asbestos. Friable samples collected were read using Polarized Light Microscopy (PLM). Non-friable organically bound samples were analyzed utilizing gravimetric reduction with Polarized Light Microscopy (PLM) and Transmission Electron Microscopy (TEM) confirmation of all PLM negatives. All samples were analyzed by Scientific Laboratories, Inc.

Building 3 was not surveyed due to unsafe conditions. It can be demolished under an applicable variance which will allow the demolition to occur without prior asbestos abatement. Buildings 5 and 7 were partially collapsed and not all areas were accessible. Only the accessible areas were surveyed.

Additionally, all light ballasts were counted in each building.

TABLE OF CONTENTS

Appendices

Jack Eisenbach Engineering, P.C.
291 Genesee Street, Utica, New York 13501
315-735-1916 Fax 315-735-6365

SAMPLE LOG

BUILDING 4

PROJECT: Charlestown Complex PROJECT #: 8916

SAMPLE NUMBER	*RESULTS (+/-)*	*MATERIAL SAMPLED*	*SAMPLE LOCATION*
8916-4-01	+	Interior Window Caulk	1'x1' Windows - 4th Floor
8916-4-02	+	Interior Window Glazing	4th Floor
8916-4-03	+	Interior Window Caulk	4th Floor
8916-4-04	+	Aircell	4th Floor
8916-4-05	+	Mag Pipe Insulation	4th Floor
8916-4-06	+	Drop Ceiling Tile	4th Floor
8916-4-07	+	Duct Insulation	4th Floor
8916-4-08	+	Fitting on Fiberglass Pipe	3rd Floor
8916-4-09	-	Sheetrock	3rd Floor
8916-4-10	-	Joint Compound	3rd Floor
8916-4-11	-	Sheetrock	2nd Floor
8916-4-12	-	Interior Window Caulk	2nd Floor
8916-4-13	-	Interior Window Glazing	2nd Floor
8916-4-14	+	Exterior Window Caulk	2nd Floor
8916-4-15	-	Exterior Window Glazing	2nd Floor

Samples Collected Anthony Scialdone

Accreditation No. AH-92-13654

NOTE:
- = Asbestos was NOT detected above the regulatory limit of 1% by weight.
+ = More than 1% asbestos by weight was detected.

Jack Eisenbach Engineering, P.C.
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315-735-1916 Fax 315-735-6365

SAMPLE LOG

BUILDING 5, 7 & 16

PROJECT: Charlestown Complex PROJECT #: 8916

SAMPLE NUMBER	*RESULTS (+/-)*	*MATERIAL SAMPLED*	*SAMPLE LOCATION*
8916-5-01		Aircell Insulation	1st Floor Hall
8916-5-02		Mag Insulation	1st Floor Hall
8916-5-03		Interior Window Glazing	1st Floor
8916-5-04		Exterior Window Glazing	1st Floor
8916-7-01		Wall Plaster	1st Floor
8916-7-02		Mag Insulation	1st Floor
8916-7-03		Fitting Insulation	3rd Floor
8916-7-04		Interior Window Glazing	1st Floor
8916-7-05		Interior Window Caulk	1st Floor
8916-7-06		Aircell Insulation	
8916-7-07		Exterior Door Caulk	
8916-7-08		Door Window Glazing	
8916-7-09		9"x9" Floor Tile	
8916-7-09M		9"x9" Floor Tile Mastic	1st Floor
8916-7-010		Exterior Window Glazing	
8916-16-01			Building #16
8916-16-02			Building #16

Samples Collected Anthony Scialdone

Accreditation No. AH-92-13654

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SAMPLE LOG

BUILDING 6

PROJECT: Charlestown Complex PROJECT #: 8916

SAMPLE NUMBER	*RESULTS (+/-)*	*MATERIAL SAMPLED*	*SAMPLE LOCATION*
8916-6-01	+	Boiler Packing	Boiler #2
8916-6-02	-	Packing Cement	Boiler #2
8916-6-03	-	Firebrick in Boiler	Boiler #2
8916-6-04	-	Packing in Boiler Peephole	Boiler #2
8916-6-05	+	Gasket Around Opening	Boiler #1
8916-6-06	+	Pipe Insulation	Boiler Room
8916-6-07	+	Fitting Insulation	Boiler Room
8916-6-08	+	Breeching	Boiler Room
8916-6-09	-	Brick Mortor	Boiler #3
8916-6-10	+	Heat Exchanger Inc.	Boiler Room
8916-6-11	+	Mag Pipe Insulation	Backup Generator Room
8916-6-12	-	Interior Window Caulk	Backup Generator Room
8916-6-13	-	Interior Window Glazing	Backup Generator Room
8916-6-14	+	Exterior Door Frame Caulk	
8916-6-15	+	Wall Plaster	Bathroom
8916-6-16	+	Ceiling Plaster	Bathroom
8916-6-17	-	Wall Plaster	Pump Room
8916-6-18	-	Transite Panel	Transformer Room
8916-6-19	-	Exterior Window Caulk	
8916-6-20	+	Exterior Window Glazing	
8916-6-21	+	Boiler Packing Insulation	Front of Boiler #1

Samples Collected Anthony Scialdone

Accreditation No. AH-92-13654

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SAMPLE LOG

BUILDING 10

PROJECT: Charlestown Complex PROJECT #: 8916

SAMPLE NUMBER	*RESULTS (+/-)*	*MATERIAL SAMPLED*	*SAMPLE LOCATION*
8916-PR-01	+	Interior Window Glazing	North Transformer Bldg.
8916-PR-02	-	Wiring	South Transformer Bldg.
8916-10-01	+	Interior Window Glazing	2nd Floor
8916-10-02	-	Interior Window Caulk	2nd Floor
8916-10-03	-	Sheetrock	3rd Floor
8916-10-04	-	Joint Compound	2nd Floor
8916-10-05	+	Interior Window Glazing	3rd Floor
8916-10-06	+	Interior Window Caulk	3rd Floor
8916-10-07	-	Sheetrock	3rd Floor
8916-10-08	-	Joint Compound	3rd Floor
8916-10-09	+	Fitting Insulation	4th Floor
8916-10-10	-	2'x4' Ceiling Tile	4th Floor
8916-10-11	+	Mag Pipe Insulation	4th Floor
8916-10-12	+	Exterior Window Caulk	
8916-10-13	+	Exterior Window Glazing	
8916-10-14	+	Exterior Door Caulk	

Samples Collected Anthony Scialdone

Accreditation No. AH-92-13654

NOTE:
- = Asbestos was NOT detected above the regulatory limit of 1% by weight.
+ = More than 1% asbestos by weight was detected.

Jack Eisenbach Engineering, P.C.
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315-735-1916 Fax 315-735-6365

SAMPLE LOG

BUILDING 11

PROJECT: Charlestown Complex PROJECT #: 8916

SAMPLE NUMBER	*RESULTS (+/-)*	*MATERIAL SAMPLED*	*SAMPLE LOCATION*
8916-11-01	+	Transite Table	Welding Equipment Room
8916-11-02	-	Firebrick	Welding Equipment Room
8916-11-03	-	Sheetrock	Welding Room
8916-11-04	-	Joint Compound	Car Storage
8916-11-05	+	9"x9" Floor Tile	Boat Storage
8916-11-05M	+	9"x9" Floor Tile Mastic	Boat Storage
8916-11-06	-	Vapor Barrier	Boat Storage
8916-11-07	+	Pipe Insulation	Boat Storage
8916-11-08	-	Fiberglass Flooring	Large Equipment Storage
8916-11-09	+	Window Caulk	Large Equipment Storage
8916-11-10	+	Window Glazing	Large Equipment Storage
8916-11-11	+	Transite Table	Large Equipment Storage
8916-11-12	-	Fitting Insulation	Boat Storage
8916-11-13	+	Exterior Window Glazing	Outside
8916-11-14	+	Exterior Window Caulk	Outside
8916-11-15	+	Door Frame Caulk	Outside Car Storage Ent.
8916-11-16	-	Sheetrock	Rm off Car Storage
8916-11-17	+	Exterior Fitting	Outside Car Storage Ent.
8916-11-18	-	Sheetrock	Hall
8916-11-19	-	Concrete Ceiling	Hannibal Storage
8916-11-22	-	Joint Compound	Hall
8916-11-23	-	Joint Compound	Car Storage
8916-11-25	-	Concrete Ceiling	Hannibal Office

Samples Collected Anthony Scialdone

Accreditation No. AH-92-13654

NOTE:
- = Asbestos was NOT detected above the regulatory limit of 1% by weight.
+ = More than 1% asbestos by weight was detected.

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315-735-1916 Fax 315-735-6365

SAMPLE LOG

BUILDING 12

PROJECT: Charlestown Complex PROJECT #: 8916

SAMPLE NUMBER	*RESULTS (+/-)*	*MATERIAL SAMPLED*	*SAMPLE LOCATION*
8916-12-01	+	Interior Window Glazing	Charlie G Bar
8916-12-02	-	Interior Window Caulk	Charlie G Bar
8916-12-03	+	Aircell Pipe Insulation	Charlie G Office
8916-12-04	-	Joint Compound	Charlie G Kitchen
8916-12-05	-	Sheetrock	Charlie G Kitchen
8916-12-06	-	Joint Compound	Charlie G Office
8916-12-07	-	Sheetrock	Charlie G Office
8916-12-08	+	Exterior Window Caulk	Charlie G Dining Rm
8916-12-09	+	Exterior Window Glazing	Charlie G Dining Rm
8916-12-10	+	Packing Material in Lights	Bar
8916-12-11	-	Interior Window Glazing	4th Floor
8916-12-12	+	Interior Window Caulk	4th Floor
8916-12-13	+	Fitting Insulation	Middle Rm - 4th Floor
8916-12-14	-	Sheetrock	4th Floor
8916-12-15	-	2'x4' Ceiling Tile	4th Floor
8916-12-16	+	Exterior Door Caulk	1st Floor
8916-12-17	+	Exterior Window Caulk	1st Floor
8916-12-18	+	Exterior Window Glazing	1st Floor

Samples Collected Anthony Sciaidone

Accreditation No. AH-92-13654

NOTE:
- = Asbestos was NOT detected above the regulatory limit of 1% by weight.
+ = More than 1% asbestos by weight was detected.

CHARLESTOWN COMPLEX
SURVEY REPORT

FINDINGS

1. **Building 3**

Building 3 was unsafe because of the roof and free standing brick walls had collapsed. It was not surveyed.

2. **Building 4**

Building 4 is a four-story structure and all areas were accessed. Materials which tested positive for asbestos in Building 4 were window caulking, window glazing, pipe and fitting insulation, 2'X4' drop ceiling tiles, and duct insulation. Below is a listing of asbestos containing materials by floor. Also included in the listing is a light ballast count and floor tile and mastic.

LOCATION	MATERIAL	APPROXIMATE AMOUNT	
First Floor	Pipe Insulation	1,580	Linear Feet
	Light Ballasts	165	Lights
Second Floor	Pipe Insulation	25	Linear Feet
	Fittings on Fiberglass Pipes	5	Fittings
	Floor Tile and Mastic	1,900	Square Feet
	Light Ballasts	45	Lights
Third Floor	Pipe Insulation	100	Linear Feet
	Fittings on Fiberglass Pipes	18	Fittings
	Floor Tile and Mastic	1,900	Square Feet
	Light Ballasts (Hanging)	164	Lights
	Light Ballasts (Piled on ground)	10	Lights
Fourth Floor	Pipe Insulation	180	Linear Feet
	Duct Insulation	25	Square Feet
	Floor Tile and Mastic	5,600	Square Feet
	Ceiling Tiles (Piled on ground)	40	Tiles
	Light Ballasts	310	Lights
Throughout Building	Window Caulk and Glazing		Throughout
Roof	Roofing		Throughout

3. **Building 5**

Building 5 is a four-story structure with most areas accessible. The top two floors were only 75% accessible due to a partially collapsed roof. Materials which tested positive for asbestos in Building 5 were floor tile and mastic, door caulk, window glazing, and pipe and fitting insulation. There was also a transite board in the electrical room on the roof, which was not sampled but assumed to contain asbestos. The building also has an underground tunnel leading to Building 11. The tunnel has asbestos containing pipe and fitting insulation throughout.

Due to the collapsed roof, there is heavy water damage throughout the building. As a result, much of the pipe insulation is severely damaged and debris has fallen to the floor. There are approximately 150 bags of asbestos containing floor tile that are stored on the second floor of this building.

Below is a listing of asbestos containing materials and light ballast count by floor.

LOCATION	MATERIAL	APPROXIMATE AMOUNT
First Floor	Floor Tile and Mastic	1,050 Square Feet
	Pipe Insulation (Intact)	1,475 Linear Feet
	Pipe Insulation Asbestos Debris	Throughout
	Light Ballasts	130 Lights
Second Floor	Pipe Insulation	100 Linear Feet
	Bags Containing Floor Tile	150 Bags
	Floor Tile/Mastic	1,000 Square Feet
	Light Ballasts (Intact)	142 Lights
	Light Ballasts (In piles)	100 Lights
Third Floor	Pipe Insulation (Intact)	900 Linear Feet
	Pipe Insulation Asbestos Debris	Throughout
	Light Ballasts	112 Lights
Fourth Floor	Pipe Insulation (Intact)	390 Linear Feet
	Pipe Insulation Asbestos Debris	Throughout
	Floor Tile/Mastic	4,950 Square Feet
	Light Ballasts	6 Lights
On Roof	Transite Board (Electrical Room)	18 Square Feet
Throughout Building	Door Caulk	Throughout
	Window Glazing	
Tunnel to Bldg. 11	Pipe Insulation	100 Linear Feet
Roof	Roofing	Throughout

4. **Building 6**

Building 6 is the former boiler house. It is a one-story structure and all areas were accessible. The building also has three underground tunnels that lead to Buildings 4, 7, and 11. Materials which tested positive for asbestos in Building 6 were boiler packing, boiler gaskets, wall and ceiling plaster, heat exchanger insulation, pipe and fitting insulation, boiler breeching, exterior window glazing and exterior door frame caulking.

Pipe insulation was found and quantified in the tunnel to Building 7. Pipe insulation could be seen in the tunnel to Building 11, but because it was collapsed and unsafe, it could not be quantified. The tunnel to Building 4 was blocked off at both ends, but it is assumed that pipe insulation exists in it. Below is a listing of asbestos containing materials and a light ballast count.

LOCATION	MATERIAL	APPROXIMATE AMOUNT
Boiler Room	Boiler Packing (on all 3 boilers)	200 Square Feet
	Boiler Gaskets (on boilers and in storage cabinet)	100 Square Feet
	Pipe Insulation	1,600 Linear Feet
	Breeching	2,000 Square Feet
	Heat Exchanger Insulation	250 Square Feet
Generator Room	Pipe Insulation	375 Linear Feet
Transformer Bldg. No. 1	Asbestos Wiring	3 Linear Feet
	Transite Electrical Panels	10 Square Feet
Water Pump Room	Pipe Insulation	125 Linear Feet
Bathroom	Wall/Ceiling Plaster	205 Square Feet
Throughout	Light Ballasts	69 Lights
Outside Building	Breeching (on ground and intact)	400 Square Feet
	Pipe Insulation	150 Linear Feet
	Door Frame Caulk	10 Linear Feet
	Exterior Window Glazing	Throughout
Tunnel to Bldg. 7	Pipe Insulation	900 Linear Feet
	Light Ballasts	2 Lights
Tunnel to Bldg. 11	Pipe Insulation	Unknown
Tunnel to Bldg. 4	Pipe Insulation (assumed)	Unknown
Roof	Roofing	Throughout

5. **Building 7**

Building 7 is a four-story structure and most areas were accessible. However, there were areas on the top two floors where the roof and walls were partially collapsed. Materials which tested positive for asbestos in Building 7 were window glazing and pipe and fitting insulation.

The entire building has been heavily water damaged due to the collapsed roof. As a result, the pipe insulation has become severely damaged and debris has fallen to the ground.

Below is a listing of asbestos containing materials by floor. Also included in the listing is a light ballast count

LOCATION	MATERIAL	APPROXIMATE AMOUNT
First Floor	Pipe Insulation (Intact)	356 Linear Feet
	Pipe Insulation Asbestos Debris	Throughout
	Light Ballasts	3 Lights
Second Floor	Pipe Insulation (Intact)	6 Linear Feet
	Pipe Insulation Asbestos Debris	Throughout
	Light Ballasts	15 Lights
Third Floor	Pipe Insulation (Intact)	360 Linear Feet
	Pipe Insulation Asbestos Debris	Throughout
	Light Ballasts	14 Lights
Fourth Floor	Pipe Insulation (Intact)	10 Linear Feet
	Pipe Insulation Asbestos Debris	Throughout
	Floor Tile/Mastic	500 Square Feet
	Light Ballasts	10 Lights
Outside Building	Window Glazing	Throughout
Roof	Roofing	Throughout

6. **Building 10**

Building 10 is a four-story structure and most areas were accessible. Materials which tested positive for asbestos in Building 10 were pipe and fitting insulation, window caulk, and window glazing. Below is a listing of asbestos containing materials by floor. Also included in the listing is a light ballast count

LOCATION	MATERIAL	APPROXIMATE AMOUNT
First Floor	Pipe Insulation	1,220 Linear Feet
	Light Ballasts	105 Lights
Second Floor	Pipe Insulation	975 Linear Feet
	Light Ballasts	163 Lights
Third Floor	Pipe Insulation	945 Linear Feet
	Light Ballasts	163 Lights
Fourth Floor	Pipe Insulation	775 Linear Feet
	Light Ballasts	215 Lights
Throughout Building	Window Caulk/Glazing	Throughout
Roof	Roofing	Throughout

7. **Buildings 11, 14 and 18**

Buildings 11, 14, and 18 are a one-story interconnected structure and all areas were easily accessible. Materials which tested positive for asbestos were pipe and fitting insulation, floor tile and mastic, window caulk and glazing, transite table tops, and exterior door frame caulk.

There were several pipes in Building 11 that were uninsulated but still had asbestos containing debris on them.

Building 14 has a ceiling that is two floors tall, and both floors contain windows. Also, a box of asbestos gaskets was identified.

Below is a listing of asbestos containing materials and light ballast count.

LOCATION	MATERIAL	APPROXIMATE AMOUNT
Building 11	Transite Table (Welding Area)	25 SQ FT
	Floor Tile and Mastic	2,000 SQ FT
	Pipe Insulation	440 Linear Feet
	Pipe Insulation w/pipe debris	300 Linear Feet
Building 14	Transite Table	25 SQ FT
	Asbestos Gaskets	1 Box
All 3 Buildings	Light Ballasts	400 Lights
Throughout Buildings	Window Caulk/Glazing	Throughout
	Door Frame Caulk	Throughout
Exterior	Fitting (Fiberglass line - Bldg. 11)	2 Fittings
	Pipe Insulation (Outside Bldg. 14)	50 Linear Feet
Roof	Roofing	Throughout

8. **Building 12**

Building 12 is a four-story structure and most areas were accessible. There were several rooms that were being used for storage that were padlocked and could not be accessed. However, most areas adjacent to locked rooms were open and we could assume what suspect materials were in the locked areas. Transformer Buildings 3 and 4 are attached to Building 12.

Materials which tested positive for asbestos in Building 12 were pipe and fitting insulation, window caulk and glazing, light packing material, and exterior door caulk. Below is a listing of asbestos containing materials by floor. Also included in the listing is a light ballast count and floor tile and mastic.

LOCATION	MATERIAL	APPROXIMATE AMOUNT
First Floor	Pipe Insulation	650 Linear Feet
	Light Ballasts	130 Lights
	Light Packing Insulation (In the Restaurant Bar)	20 Lights
Second Floor	Pipe Insulation	1,065 Linear Feet
	Fittings (On Fiberglass Lines)	76 Fittings
	Floor Tile/Mastic	500 Square Feet
	Light Ballasts	246 Lights
Third Floor	Pipe Insulation	1,150 Linear Feet
	Light Ballasts	240 Lights
Fourth Floor	Pipe Insulation	1,150 Linear Feet
	Floor Tile/Mastic	3,000 Square Feet
	Fittings (On Fiberglass Lines)	93 Fittings
	Fittings (On cut pipes on ground)	20 Fittings
	Light Ballasts	250 Lights
Throughout Building	Exterior Window Caulk/Glazing	Throughout
	Interior Window Caulk/Glazing	Throughout
	Exterior Door Caulk	Throughout
Transformer Buildings 3 and 4	Interior Window Glazing	Throughout
Roof	Roofing	Throughout

9. **Building 16**

Building 16 is a small one-story garage. The asbestos containing material identified in this building is pipe insulation. There is approximately 10 linear feet of pipe insulation inside the building, and 50 linear feet outside the building.

10. **Transformer Building No. 2**

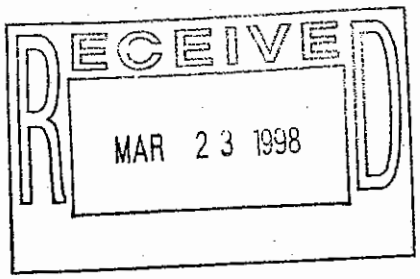
Tranformer Building No. 2 is a small one-story structure. The asbestos containing material identified in this building is window glazing.

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 Fax 212/679-9392



March 14, 1998

JACK EISENBACH ENGINEERING, P.C.
Attn: Mr. Eisenbach
291 Genesee Street
Utica, NY 13501

RE: JACK EISENBACH ENGINEERING, P.C.
Job Number 98035939
P.O. # 8916
8916; Charlestown; Building #4

Dear Mr. Eisenbach:

Enclosed are the results of Asbestos Analysis - Bulk Protocol of the following JACK EISENBACH ENGINEERING, P.C. samples, received at Scientific Laboratories on Thursday, March 12, 1998, for a 3 day turnaround:

8916-4-01, 8916-4-02, 8916-4-03, 8916-4-04, 8916-4-05, 8916-4-06, 8916-4-07, 8916-4-08, 8916-4-09, 8916-4-10, 8916-4-11, 8916-4-12, 8916-4-13, 8916-4-14, 8916-4-15

The 15 samples, placed in zip lock bag, were shipped to SciLab via Hand Delivered. JACK EISENBACH ENGINEERING, P.C. requested ELAP PLM/TEM analysis of these samples.

The results of the analyses performed under ELAP 198.1 & 198.4 guidelines are presented within the Summary Table of this report. The presence of matrix reduction data in the Summary Table normally indicates an NOB sample. For NOB samples the individual matrix reduction and TEM analysis results are listed in the TEM report in the Appendix. Complete PLM results for individual samples are presented in the Appendix of this combined report. This report relates ONLY to sample analysis expressed as percent composition by weight and percent asbestos. This report must not be used to claim product endorsement or approval by these laboratories, NVLAP, ELAP or any other associated agency.

SciLab appreciates this opportunity to serve your organization. Please contact us for any further assistance or with any questions.

Sincerely,

Paul Mucha

Paul Mucha
Laboratory Supervisor

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/12/98 **SciLab Job No.** 98035939
Date Examined 3/13/98 **P.O. #** 8916
ELAP Number 11480 **Page** 1 **of** 4
RE: 8916; Charlestown; Building #4

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-4-01	98035939-01	*Yes*	4.1 %

Location: 1x1 Windows, Fouth Floor

Description: Grey, Homogeneous, Interior Window Caulk
Asbestos Types: Chrysotile 4.1 %
Other Material: Non-fibrous 37.6 %

Comment: PLM Analysis Of NOB Inert Residue

8916-4-02	98035939-02	*Yes*	≤ 1. %

Location: 4th Floor

Description: Grey, Homogeneous, Interior Window Glazing
Asbestos Types: Chrysotile <1. %
Other Material: Non-fibrous >73.1 %

Comment: PLM Analysis Of NOB Inert Residue

8916-4-03	98035939-03	*Yes*	≤ 1. %

Location: 4th Floor

Description: Grey, Homogeneous, Interior Window Caulk
Asbestos Types: Chrysotile <1. %
Other Material: Non-fibrous 70.6 %

Comment: PLM Analysis Of NOB Inert Residue

8916-4-04	98035939-04	*Yes*	57 %

Location: 4th Floor

Description: Off White, Homogeneous, Aircell
Asbestos Types: Chrysotile 57. %
Other Material: Non-fibrous 43. %

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/12/98 **SciLab Job No.** 98035939
Date Examined 3/13/98 **P.O. #** 8916
ELAP Number 11480 **Page** 2 **of** 4
RE: 8916; Charlestown; Building #4

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-4-05	98035939-05	*Yes*	44 %

Location: 4th Floor

Description: Off White, Homogeneous, Mag Pipe Insulation
Asbestos Types: Amosite 44. %
Other Material: Non-fibrous 56. %

8916-4-06	98035939-06	*Yes*	3.7 %

Location: 4th Floor

Description: Off White, Homogeneous, Drop Ceiling Tile
Asbestos Types: Chrysotile 3.7 %
Other Material: Fibrous glass 70. %, Non-fibrous 26.3 %

8916-4-07	98035939-07	*Yes*	66 %

Location: 4th Floor

Description: Grey, Homogeneous, Duct Insulation
Asbestos Types: Chrysotile 66. %
Other Material: Non-fibrous 34. %

8916-4-08	98035939-08	*Yes*	66 %

Location: 3rd Floor

Description: Beige, Homogeneous, Fitting on FG Pipe
Asbestos Types: Chrysotile 66. %
Other Material: Non-fibrous 34. %

8916-4-09	98035939-09	*No*	NAD

Location: 3rd Floor

Description: Off White, Homogeneous, Sheetrock
Asbestos Types:
Other Material: Cellulose 15. %, Fibrous glass 5. %, Non-fibrous 80. %

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/12/98
Date Examined 3/13/98
ELAP Number 11480

SciLab Job No. 98035939
P.O. # 8916

RE: 8916; Charlestown; Building #4

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-4-10	98035939-10	*No*	NAD

Location: 3rd Floor

Description: White, Homogeneous, Joint Compound
Asbestos Types:
Other Material: Non-fibrous 100. %

8916-4-11	98035939-11	*No*	NAD

Location: 3rd Floor

Description: White, Homogeneous, Sheetrock
Asbestos Types:
Other Material: Cellulose 15. %, Fibrous glass 3. %, Non-fibrous 82. %

8916-4-12	98035939-12	*Yes*	≤ 1. %

Location: 2nd Floor

Description: Grey, Homogeneous, Interior Window Caulk
Asbestos Types: Chrysotile Trace
Other Material: Non-fibrous 69.2 %

Comment: PLM Analysis Of NOB Inert Residue

8916-4-13	98035939-13	*No*	NAD

Location: 2nd Floor

Description: Grey, Homogeneous, Interior Window Glazing
Asbestos Types:
Other Material: Non-fibrous 48.1 %

Comment: PLM Analysis Of NOB Inert Residue

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/12/98 **SciLab Job No.** 98035939
Date Examined 3/13/98 **P.O. #** 8916
ELAP Number 11480 **Page** 4 **of** 4
RE: 8916; Charlestown; Building #4

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-4-14	98035939-14	*Yes*	10.8 %

Location: Exterior Window

Description: Grey, Homogeneous, Exterior Window Caulk
Asbestos Types: Chrysotile 10.8 %
Other Material: Non-fibrous 39.6 %

Comment: PLM Analysis Of NOB Inert Residue

8916-4-15	98035939-15	*No*	NAD

Location: Exterior Window

Description: Grey, Homogeneous, Exterior Window Glazing
Asbestos Types:
Other Material: Non-fibrous 48.2 %

Comment: PLM Analysis Of NOB Inert Residue

Reporting Notes:

Analyzed by: Bella Chernis Paul Clarke for BC

*NAD/NSD = no asbestos detected; NA = not analyzed; NAPS = not analyzed positive stop; Bulk Asbestos Analysis per 40 CFR 763, Subpart F, Appendix A and ELAP Analysis Protocols 198.1/198.4 for NY samples; Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in NY State (see also EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). National Institute of Standards and Technology Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This report relates ONLY to the items tested. ELAP #11480, Vt. Cert. #AL016055

Reviewed By: Paul Clarke

SciLab Job#: **98-03-5939**
Client Name: JACK EISENBACH ENGINEERING, P.C.

Table I
Summary of Bulk Asbestos Analysis Results
8916; Charlestown; Building #4

SciLab Sample #	Client Sample# Location	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS ELAP # 11480	** Asbestos % by TEM ELAP # 11480
01	8916-4-01 1x1 Windows, Fouth Floor		0.453	24.06	34.22	37.62	Chrysotile 4.1	NA
02	8916-4-02 4th Floor		0.95	9.26	17.58	65.84	Chrysotile <1.	Chrysotile 7.32
03	8916-4-03 4th Floor		1.085	17.05	12.26	67.16	Chrysotile <1.	Chrysotile 3.53
04	8916-4-04 4th Floor		----	---	---	---	Chrysotile 57.	NA
05	8916-4-05 4th Floor		----	----	----	----	Amosite 44.	NA
06	8916-4-06 4th Floor		---	----	----	---	Chrysotile 3.7	NA
07	8916-4-07 4th Floor		---	----	---	---	Chrysotile 66.	NA
08	8916-4-08 3rd Floor		---	---	---	---	Chrysotile 66.	NA

Reviewed by: _____

PLM analyst: Bella Chernis_____; TEM analyst: Lance Tuckruskye Lance Tuckruskye

Quantification should be considered qualitative only (positive or negative) for beginning sample weights of less than 0.1 grams. NAD = no asbestos detected; NA = not analyzed; Trace = <1%; NAPS = not analyzed positive stop; Bulk Asbestos Analysis - PLM per 40 CFR 763, Subpt F, Appd A; - TEM by Chatfield and ELAP Analysis Protocol PLM-198.1/TEM-198.4 for New York samples; Note: TEM resolves all asbestos fibers whereas PLM typically will not resolve fibers <~0.2 microns in diameter.

Reviewed By: Lance Tuckruskye

SciLab Job#: **98-03-5939**
Client Name: JACK EISENBACH ENGINEERING, P.C.

Table I
Summary of Bulk Asbestos Analysis Results
8916; Charlestown; Building #4

SciLab Sample #	Client Sample# Location	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS ELAP # 11480	** Asbestos % by TEM ELAP # 11480
09	8916-4-09 3rd Floor		----	----	----	----	NAD	NA
10	8916-4-10 3rd Floor		----	----	----	----	NAD	NA
11	8916-4-11 3rd Floor		----	----	----	----	NAD	NA
12	8916-4-12 2nd Floor		0.748	14.30	16.44	69.25	Chrysotile Trace	Chrysotile Trace
13	8916-4-13 2nd Floor		0.823	24.30	27.58	48.12	NAD	NAD
14	8916-4-14 Exterior Window		0.797	30.49	19.07	39.64	Chrysotile 10.8	NA
15	8916-4-15 Exterior Window		0.792	30.93	20.83	48.23	NAD	NAD

Reviewed by: _____

PLM analyst: Bella Chernis_____; TEM analyst: Lance Tuckruskye Lance Tuckruskye

Quantification should be considered qualitative only (positive or negative) for beginning sample weights of less than 0.1 grams. NAD = no asbestos detected; NA = not analyzed; Trace = <1%; NAPS = not analyzed positive stop; Bulk Asbestos Analysis - PLM per 40 CFR 763, Subpt F, Appd A; - TEM by Chatfield and ELAP Analysis Protocol PLM-198.1/TEM-198.4 for New York samples; Note: TEM resolves all asbestos fibers whereas PLM typically will not resolve fibers <~0.2 microns in diameter.

Reviewed By: Lance Tuckruskye

98035939

JACK EISENBACH ENGINEERING, P.C.

291 GENESEE STREET, UTICA, NEW YORK 13501 • 315•735•1916 • FAX 315•735•6365

CLIENT: CHARLESTOWN

ADDRESS:

PROJECT #: 8916

DATE(S) COLLECTED: 3/11/98

SAMPLES COLLECTED BY: TONY SCIALDONE

LABORATORY: SCI LAB

TYPE of ANALYSIS

ASBESTOS BULK		ASBESTOS AIR		LEAD	
PLM Only		PCM		AA NIOSH 7082	
TEM Only		TEM AHERA			
PLM/ TEM As Required By ELAP	X	TEM NIOSH 7402			

TURNAROUND TIME

RUSH		72 Hour	X	OTHER	

CHAIN OF CUSTODY

	PRINTED NAME	SIGNATURE	AFFILIATION	DATE	# OF SAMPLES
REMITTED BY:	Tony Scialdone		JEE	3/11/98	15
RECEIVED BY:	A. Lopez		SciLab.	3/12/98	1200

REMITTED BY:

RECEIVED BY:

REMITTED BY:

RECEIVED BY:

PLEASE FAX RESULTS ASAP TO (315) 735 - 6365 , ATTN: TONY

NOTES:

2

Jack Eisenbach Engineering, P.C.
291 Genesee Street, Utica, New York 13501
315-735-1916 Fax 315-735-6365

SAMPLE LOG

PROJECT: Charlestown - Bldg. #4 PROJECT #: 8916

SAMPLE NUMBER	HOMO ID #	RESULTS (+/-)	MATERIAL SAMPLED	SAMPLE LOCATION
8916-4-01			INT. WINDOW CAULK	1x1 WINDOWS - 4th FLOOR
- 02			INT. WINDOW GLAZING	4th FLOOR
- 03			INT. WINDOW CAULK	4th FLOOR
- 04			AIRCELL	4th FLOOR
- 05			MAG. PIPE INSULATION	4th FLOOR
- 06			DROP CEILING TILE	4th FLOOR
- 07			DUCT INSULATION	4th FLOOR
- 08			FITTING ON F.G. PIPE	3RD FLOOR
- 09			SHEETROCK	3RD FLOOR
- 10			JOINT COMPOUND	3RD FLOOR
- 11			SHEETROCK	2ND FLOOR
- 12			INT. WINDOW CAULK	~~1ST FLOOR~~ 2ND FLOOR
- 13			INT. WINDOW GLAZING	2ND FLOOR
- 14			EXT. WINDOW CAULK	—
- 15			EXT. WINDOW GLAZING	—

Samples Collected By: Tony Scialdone

Accreditation No: AH92-13654

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 Fax 212/679-9392

March 8, 1998

JACK EISENBACH ENGINEERING, P.C.
Attn: Mr. Eisenbach
291 Genesee Street
Utica, NY 13501

RE: JACK EISENBACH ENGINEERING, P.C.
Job Number 98035425
P.O. # 8916
8916; Charlestown; Buildings 5, 7, & 16

Dear Mr. Eisenbach:

Enclosed are the results of Asbestos Analysis - Bulk Protocol of the following JACK EISENBACH ENGINEERING, P.C. samples, received at Scientific Laboratories on Thursday, March 5, 1998, for a 3 day turnaround:

8916-16-01, 8916-16-02, 8916-5-001, 8916-5-002, 8916-5-003, 8916-5-004, 8916-7-001, 8916-7-002, 8916-7-003, 8916-7-004, 8916-7-005, 8916-7-006, 8916-7-007, 8916-7-008, 8916-7-009T, 8916-7-009M, 8916-7-010

The 17 samples, placed in zip lock bag, were shipped to SciLab via Federal Express. JACK EISENBACH ENGINEERING, P.C. requested ELAP PLM/TEM analysis of these samples.

The results of the analyses performed under ELAP 198.1 & 198.4 guidelines are presented within the Summary Table of this report. The presence of matrix reduction data in the Summary Table normally indicates an NOB sample. For NOB samples the individual matrix reduction and TEM analysis results are listed in the TEM report in the Appendix. Complete PLM results for individual samples are presented in the Appendix of this combined report. This report relates ONLY to sample analysis expressed as percent composition by weight and percent asbestos. This report must not be used to claim product endorsement or approval by these laboratories, NVLAP, ELAP or any other associated agency.

SciLab appreciates this opportunity to serve your organization. Please contact us for any further assistance or with any questions.

Sincerely,

Paul Mucha
Laboratory Supervisor

NOTE: Sample Results for Bldg. 5 are actually for Bldg. 7. And Bldg. 7 should be Bldg. 5 too.

SciLab

MAR 12 1998

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/5/98
Date Examined 3/7/98

SciLab Job No. 98035425
P.O. # 8916

RE: 8916; Charlestown; Buildings 5, 7, & 16

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-16-01	98035425-01	*Yes*	13 %

Location: Building #16

Description: Grey, Homogeneous, Mag Insulation
Asbestos Types: Amosite 13. %
Other Material: Non-fibrous 87. %

8916-16-02	98035425-02	*Yes*	≤ 1. %

Location: Building #16

Description: Grey, Homogeneous, Door Window Glazing
Asbestos Types: Anthophyllite Trace
Other Material: Non-fibrous 0.2 %

Comment: PLM Analysis Of NOB Inert Residue

8916-5-001	98035425-03	*Yes*	40 %

Location: 1st Floor Hall

Description: Grey, Homogeneous, Insulation - Aircell
Asbestos Types: Chrysotile 40. %
Other Material: Cellulose 5. %, Non-fibrous 55. %

8916-5-002	98035425-04	*Yes*	14 %

Location: 1st Floor Hall

Description: Grey, Homogeneous, Mag Insulation
Asbestos Types: Amosite 14. %
Other Material: Non-fibrous 86. %

SciLab
Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.
117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/5/98
Date Examined 3/7/98

SciLab Job No. 98035425
P.O. # 8916

RE: 8916; Charlestown; Buildings 5, 7, & 16

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-5-003	98035425-05	*No*	NAD

Location: 1st Floor
Description: Grey, Homogeneous, Interior Window Glazing
Asbestos Types:
Other Material: Non-fibrous 3.9 %
Comment: PLM Analysis Of NOB Inert Residue

8916-5-004	98035425-06	*Yes*	≤ 1. %

Location: 1st Floor
Description: Grey, Homogeneous, Exterior Window Glazing
Asbestos Types: Chrysotile <1. %
Other Material: Non-fibrous >3.4 %
Comment: PLM Analysis Of NOB Inert Residue

8916-7-001	98035425-07	*No*	NAD

Location: 1st Floor
Description: Grey, Homogeneous, Cementitious, Wall Plaster
Asbestos Types:
Other Material: Cellulose 5. %, Non-fibrous 95. %

8916-7-002	98035425-08	*Yes*	35.2 %

Location: 1st Floor
Description: Grey, Homogeneous, Mag Insulation
Asbestos Types: Amosite 4.2 %, Chrysotile 31. %
Other Material: Non-fibrous 64.8 %

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/5/98
Date Examined 3/7/98

SciLab Job No. 98035425
P.O. # 8916

RE: 8916; Charlestown; Buildings 5, 7, & 16

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-7-003	98035425-09	*No*	NAD

Location: 3rd Floor

Description: Grey, Homogeneous, Fiberglass Fitting Insulation
Asbestos Types:
Other Material: Fibrous glass 30. %, Non-fibrous 70. %

8916-7-004	98035425-10	*Yes*	≤ 1. %

Location: 1st Floor

Description: Grey, Homogeneous, Interior Window Glazing
Asbestos Types: Chrysotile Trace
Other Material: Non-fibrous 0.7 %

Comment: PLM Analysis Of NOB Inert Residue

8916-7-005	98035425-11	*Yes*	2 %

Location: 1st Floor

Description: Grey, Homogeneous, Interior Window Caulking
Asbestos Types: Chrysotile 2.0 %
Other Material: Non-fibrous 6.0 %

Comment: PLM Analysis Of NOB Inert Residue

8916-7-006	98035425-12	*Yes*	57 %

Location: 1st Floor

Description: Grey, Homogeneous, Aircell Insulation
Asbestos Types: Chrysotile 57. %
Other Material: Cellulose 10. %, Non-fibrous 33. %

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/5/98
Date Examined 3/7/98

SciLab Job No. 98035425
P.O. # 8916

RE: 8916; Charlestown; Buildings 5, 7, & 16

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-7-007	98035425-13	*Yes*	7.3 %

Location: 1st Floor

Description: Grey, Homogeneous, Ext. Door Caulk
Asbestos Types: Chrysotile 7.3 %
Other Material: Non-fibrous 10.9 %
Comment: PLM Analysis Of NOB Inert Residue

8916-7-008	98035425-14	*No*	NAD

Location: 1st Floor

Description: Grey, Homogeneous, Door Window Glazing
Asbestos Types:
Other Material: Non-fibrous 8.2 %
Comment: PLM Analysis Of NOB Inert Residue

8916-7-009T	98035425-15	*Yes*	3.5 %

Location: 1st Floor

Description: Grey, Homogeneous, 9x9 Floor Tile
Asbestos Types: Chrysotile 3.5 %
Other Material: Non-fibrous 30.1 %
Comment: PLM Analysis Of NOB Inert Residue

8916-7-009M	98035425-16	*No*	NAD

Location: 1st Floor

Description: Black, Homogeneous, 9x9 Floor Tile Mastic
Asbestos Types:
Other Material: Non-fibrous 17.5 %
Comment: PLM Analysis Of NOB Inert Residue

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/5/98
Date Examined 3/7/98

SciLab Job No. 98035425
P.O. # 8916

RE: 8916; Charlestown; Buildings 5, 7, & 16

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-7-010	98035425-17	*No*	NAD

Location: 1st Floor

Description: Silver, Homogeneous, Ext. Window Glazing
Asbestos Types:
Other Material: Non-fibrous 1.9 %

Comment: PLM Analysis Of NOB Inert Residue

Reporting Notes:

Analyzed by: Bonni Mora Bonni Mora

*NAD/NSD = no asbestos detected; NA = not analyzed; NAPS = not analyzed positive stop; Bulk Asbestos Analysis per 40 CFR 763, Subpart F, Appendix A and ELAP Analysis Protocols 198.1/198.4 for NY samples; Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in NY State (see also EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). National Institute of Standards and Technology Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This report relates ONLY to the items tested. ELAP #11480, Vt. Cert. #AL016055

Reviewed By:

SciLab Job#: **98-03-5425**
Client Name: JACK EISENBACH ENGINEERING, P.C.

Table I
Summary of Bulk Asbestos Analysis Results
8916; Charlestown; Buildings 5, 7, & 16

SciLab Sample #	Client Sample# Location	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS ELAP # 11480	** Asbestos % by TEM ELAP # 11480
01	8916-16-01 Building #16		----	----	----	----	Amosite 13.	NA
02	8916-16-02 Building #16		0.51	7.25	92.55	0.20	Anthophyllite Trace	Chrysotile Trace
03	8916-5-001 1st Floor Hall		----	----	----	----	Chrysotile 40.	NA
04	8916-5-002 1st Floor Hall		----	----	----	----	Amosite 14.	NA
05	8916-5-003 1st Floor		0.284	10.56	85.56	3.87	NAD	Chrysotile Trace
06	8916-5-004 1st Floor		0.587	25.04	70.53	2.43	Chrysotile <1.	Chrysotile 2.0
07	8916-7-001 1st Floor		----	----	----	----	NAD	NA
08	8916-7-002 1st Floor		----	----	----	----	Amosite 4.2 Chrysotile 31.	NA

Reviewed by: Paul Mucha

PLM analyst: Bonni Mora_____; TEM analyst: Paul Mucha Paul Mucha

Quantification should be considered qualitative only (positive or negative) for beginning sample weights of less than 0.1 grams. NAD = no asbestos detected; NA = not analyzed; Trace <1%; NAPS = not analyzed positive stop; Bulk Asbestos Analysis - PLM per 40 CFR 763, Subpt F, Appd A; - TEM by Chatfield and ELAP Analysis Protocol PLM-198.1/TEM-198.4 fo New York samples; Note: TEM resolves all asbestos fibers whereas PLM typically will not resolve fibers <~0.2 microns in diameter.

Reviewed By: _____

SciLab Job#: **98-03-5425**
Client Name: JACK EISENBACH ENGINEERING, P.C.

Table I
Summary of Bulk Asbestos Analysis Results
8916; Charlestown; Buildings 5, 7, & 16

SciLab Sample #	Client Sample# Location	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS ELAP # 11480	** Asbestos % by TEM ELAP # 11480
09	8916-7-003 3rd Floor		---	---	---	---	NAD	NA
10	8916-7-004 1st Floor		0.418	23.44	75.84	0.72	Chrysotile Trace	Chrysotile Trace
11	8916-7-005 1st Floor		0.538	7.99	84.01	5.99	Chrysotile 2.0	NA
12	8916-7-006 1st Floor		---	---	---	---	Chrysotile 57.	NA
13	8916-7-007 1st Floor		0.264	34.47	47.35	10.88	Chrysotile 7.3	NA
14	8916-7-008 1st Floor		0.822	26.03	65.69	8.27	NAD	Chrysotile Trace
15	8916-7-009T 1st Floor		0.11	64.55	3.64	28.32	Chrysotile 3.5	NA
16	8916-7-009M 1st Floor		0.297	19.53	62.96	15.51	NAD	Chrysotile 2.0

Reviewed by: Paul Mucha

PLM analyst: Bonni Mora; TEM analyst: Paul Mucha Paul Mucha

Quantification should be considered qualitative only (positive or negative) for beginning sample weights of less than 0.1 grams. NAD = no asbestos detected; NA = not analyzed; Trace = <1%; NAPS = not analyzed positive stop; Bulk Asbestos Analysis - PLM per 40 CFR 763, Subpt F, Appd A; - TEM by Chatfield and ELAP Analysis Protocol PLM-198.1/TEM-198.4 for New York samples; Note: TEM resolves all asbestos fibers whereas PLM typically will not resolve fibers <~0.2 microns in diameter.

Reviewed By: _____

SciLab Job#: **98-03-5425**
Client Name: JACK EISENBACH ENGINEERING, P.C.

Table I
Summary of Bulk Asbestos Analysis Results
8916; Charlestown; Buildings 5, 7, & 16

SciLab Sample #	Client Sample# Location	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS ELAP # 11480	** Asbestos % by TEM ELAP # 11480
17	8916-7-010 1st Floor		0.533	47.47	50.66	1.88	NAD	Chrysotile Trace

Reviewed by: Paul Mucha

PLM analyst: Bonni Mora; TEM analyst: Paul Mucha Paul Mucha

Quantification should be considered qualitative only (positive or negative) for beginning sample weights of less than 0.1 grams. NAD = no asbestos detected; NA = not analyzed; Trace = <1%; NAPS = not analyzed positive stop; Bulk Asbestos Analysis - PLM per 40 CFR 763, Subpt F, Appd A; - TEM by Chatfield and ELAP Analysis Protocol PLM-198.1/TEM-198.4 for New York samples; Note: TEM resolves all asbestos fibers whereas PLM typically will not resolve fibers <~0.2 microns in diameter.

Reviewed By: _____

JACK EISENBACH ENGINEERING, P.C.

291 GENESEE STREET, UTICA, NEW YORK 13501 • 315•735•1916 • FAX 315•735•6365

CLIENT: Charlestown
ADDRESS: Buildings 5, 6, 7, 16
LABORATORY: SCI LAB

PROJECT #: 89/6
DATE(S) COLLECTED: 3-3-98 & 2-27-98
SAMPLES COLLECTED BY: Tony Scialdone / Jim Wheeler

TYPE of ANALYSIS

ASBESTOS BULK	
PLM Only	
TEM Only	
PLM/ TEM As Required By ELAP	X

ASBESTOS AIR	
PCM	
TEM AHERA	
TEM NIOSH 7402	

LEAD	
AA NIOSH 7082	

TURNAROUND TIME

RUSH		72 Hour	X	OTHER	

CHAIN OF CUSTODY

	PRINTED NAME	SIGNATURE	AFFILIATION	DATE	# OF SAMPLES
REMITTED BY:	Tony Scialdone	Tony Scialdone	JEE	3/4/98	37
RECEIVED BY:	Mary Cinda Lopez		SciLab	3/5/98	37
REMITTED BY:					
RECEIVED BY:					
REMITTED BY:					
RECEIVED BY:					

PLEASE FAX RESULTS ASAP TO (315) 735 - 6365, ATTN: TONY

NOTES:

98025425

Jack Eisenbach Engineering, P.C.
291 Genesee Street, Utica, New York 13501
315-735-1916 Fax 315-735-6365

SAMPLE LOG

PROJECT: Charlestown - Buildings 5, 7 & 16 PROJECT #: 8916

SAMPLE NUMBER	HOMO ID #	RESULTS (+/-)	MATERIAL SAMPLED	SAMPLE LOCATION
8916-16-01		F	MAG INSULATION	Building #16
-16-02		N	DOOR WINDOW GLAZING	"
8916-5-001		F	[redacted] INSULATION - AIRCELL	1st Floor Hall
-5-002		F	MAG INSULATION	"
-5-003		N	INTERIOR WINDOW GLAZING	1st Floor
-5-004		N	EXTERIOR WINDOW GLAZING	"
8916-7-001		F	WALL PLASTER	1st Floor
-7-002		F	MAG INSULATION	"
S-7-003	X	F	F.G. FITTING INS.	3rd Floor
S-7-004		N	INTERIOR WINDOW GLAZING	1st Floor
S-7-005		N	INTERIOR WINDOW CAULK	"
S-7-006		F	AIRCELL INSULATION	
S-7-007		N	EXT. DOOR CAULK	
S-7-008		N	DOOR WINDOW GLAZING	
S-7-009	/009M	N	9x9 FLOOR TILE /MASTIC	1st Floor
S-7-010		N	EXT. WINDOW GLAZING	

Samples Collected By: Tony Scialdone

Accreditation No: AH92-13654

98035425

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 Fax 212/679-9392

March 9, 1998

JACK EISENBACH ENGINEERING, P.C.
Attn: Mr. Eisenbach
291 Genesee Street
Utica, NY 13501

RE: JACK EISENBACH ENGINEERING, P.C.
Job Number 98035438
P.O. # 8916
8916; Charlestown

Dear Mr. Eisenbach:

Enclosed are the results of Asbestos Analysis - Bulk Protocol of the following JACK EISENBACH ENGINEERING, P.C. samples, received at Scientific Laboratories on Thursday, March 5, 1998, for a 3 day turnaround:

8916-6-001, 8916-6-002, 8916-6-003, 8916-6-004, 8916-6-005, 8916-6-006, 8916-6-007, 8916-6-008, 8916-6-009, 8916-6-010, 8916-6-011, 8916-6-012, 8916-6-013, 8916-6-014, 8916-6-015, 8916-6-016, 8916-6-017, 8916-6-018, 8916-6-019, 8916-6-020, 8916-6-021

The 21 samples, placed in zip lock bag, were shipped to SciLab via Federal Express. JACK EISENBACH ENGINEERING, P.C. requested ELAP PLM/TEM analysis of these samples.

The results of the analyses performed under ELAP 198.1 & 198.4 guidelines are presented within the Summary Table of this report. The presence of matrix reduction data in the Summary Table normally indicates an NOB sample. For NOB samples the individual matrix reduction and TEM analysis results are listed in the TEM report in the Appendix. Complete PLM results for individual samples are presented in the Appendix of this combined report. This report relates ONLY to sample analysis expressed as percent composition by weight and percent asbestos. This report must not be used to claim product endorsement or approval by these laboratories, NVLAP, ELAP or any other associated agency.

SciLab appreciates this opportunity to serve your organization. Please contact us for any further assistance or with any questions.

Sincerely,

Paul Mucha
Laboratory Supervisor

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/5/98
Date Examined 3/7/98

RE: 8916; Charlestown

SciLab Job No. 98035438
P.O. # 8916

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-6-001	98035438-01	*Yes*	28 %

Location: Boiler #2

Description: Grey, Homogeneous, Boiler Packing
Asbestos Types: Chrysotile 28. %
Other Material: Fibrous glass 20. %, Non-fibrous 52. %

8916-6-002	98035438-02	*No*	NAD

Location: Boiler #2

Description: Red, Homogeneous, Cementitious, Packing Cement
Asbestos Types:
Other Material: Non-fibrous 100. %

8916-6-003	98035438-03	*No*	NAD

Location: Boiler #2

Description: Brown, Homogeneous, Cementitious, Fire Brick
Asbestos Types:
Other Material: Non-fibrous 100. %

8916-6-004	98035438-04	*No*	NAD

Location: Boiler #

Description: Brown, Homogeneous, Cementitious, Boiler Packing
Asbestos Types:
Other Material: Non-fibrous 100. %

8916-6-005	98035438-05	*Yes*	80 %

Location: Boiler #1

Description: Grey, Homogeneous, Gasket
Asbestos Types: Chrysotile 80. %
Other Material: Non-fibrous 20. %

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

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PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/5/98
Date Examined 3/7/98

RE: 8916; Charlestown

SciLab Job No. 98035438
P.O. # 8916

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-6-006	98035438-06	*Yes*	26.8 %

Location: Boiler Room

Description: Off White, Homogeneous, Pipe Insulation
Asbestos Types: Amosite 22. %, Chrysotile 4.8 %
Other Material: Non-fibrous 73.2 %

8916-6-007	98035438-07	*Yes*	50 %

Location: Boiler Room

Description: Grey, Homogeneous, Fitting
Asbestos Types: Chrysotile 50. %
Other Material: Non-fibrous 50. %

8916-6-008	98035438-08	*Yes*	44 %

Location: Boiler Room

Description: Grey, Homogeneous, Breeching
Asbestos Types: Chrysotile 44. %
Other Material: Non-fibrous 56. %

8916-6-009	98035438-09	*No*	NAD

Location: Boiler #3

Description: Grey, Homogeneous, Brick Mortar
Asbestos Types:
Other Material: Non-fibrous 86.2 %

Comment: PLM analysis of NOB inert residue

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/5/98
Date Examined 3/7/98

RE: 8916; Charlestown

SciLab Job No. 98035438
P.O. # 8916

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-6-010	98035438-10	*Yes*	50 %

Location: Boiler Room

Description: Grey, Homogeneous, Insulation
Asbestos Types: Chrysotile 50. %
Other Material: Non-fibrous 50. %

8916-6-011	98035438-11	*Yes*	40 %

Location: Back Up Generator Room

Description: Grey, Homogeneous, Pipe Insulation
Asbestos Types: Chrysotile 40. %
Other Material: Non-fibrous 60. %

8916-6-012	98035438-12	*No*	NAD

Location: Backup Generator Room

Description: Grey, Homogeneous, Caulk
Asbestos Types:
Other Material: Non-fibrous 4.3 %
Comment: PLM analysis of NOB inert residue

8916-6-013	98035438-13	*No*	NAD

Location: Backup Generator Room

Description: Grey, Homogeneous, Window Glazing
Asbestos Types:
Other Material: Non-fibrous 7.6 %
Comment: PLM analysis of NOB inert residue

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/5/98
Date Examined 3/7/98

RE: 8916; Charlestown

SciLab Job No. 98035438
P.O. # 8916

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-6-014	98035438-14	*Yes*	2.4 %

Location: Backup Generator Room

Description: Grey, Homogeneous, Caulk
Asbestos Types: Chrysotile 2.4 %
Other Material: Non-fibrous 3.7 %

Comment: PLM analysis of NOB inert residue

8916-6-015	98035438-15	*Yes*	36 %

Location: Bathroom

Description: Grey, Homogeneous, Wall Plaster
Asbestos Types: Chrysotile 36. %
Other Material: Cellulose 2. %, Non-fibrous 62. %

8916-6-016	98035438-16	*Yes*	27 %

Location: Bathroom

Description: Grey, Homogeneous, Ceiling Plaster
Asbestos Types: Chrysotile 27. %
Other Material: Non-fibrous 73. %

8916-6-017	98035438-17	*No*	NAD

Location: Pump Room

Description: Grey, Homogeneous, Cementitious, Wall Plaster
Asbestos Types:
Other Material: Cellulose Trace, Non-fibrous 100. %

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/5/98
Date Examined 3/7/98

RE: 8916; Charlestown

SciLab Job No. 98035438
P.O. # 8916

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-6-018	98035438-18	*No*	NAD

Location: Transformer Room

Description: Grey, Homogeneous, Cementitious, Wall Plaster
Asbestos Types:
Other Material: Non-fibrous 100. %

8916-6-019	98035438-19	*No*	NAD

Location: Transformer Room

Description: Grey, Homogeneous, Caulk
Asbestos Types:
Other Material: Non-fibrous 61.4 %

Comment: PLM analysis of NOB inert residue

8916-6-020	98035438-20	*Yes*	2.1 %

Location: Transformer Room

Description: Grey, Homogeneous, Window Glazing
Asbestos Types: Chrysotile 2.1 %
Other Material: Non-fibrous 3.8 %

Comment: PLM analysis of NOB inert residue

8916-6-021	98035438-21	*Yes*	27 %

Location: Front of Boiler #1

Description: Grey, Homogeneous, Boiler Insulation
Asbestos Types: Chrysotile 27. %
Other Material: Fibrous glass 20. %, Non-fibrous 53. %

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/5/98
Date Examined 3/7/98

RE: 8916; Charlestown

SciLab Job No. 98035438
P.O. # 8916

Reporting Notes:

Analyzed by: Bonni Mora

*NAD/NSD = no asbestos detected; NA = not analyzed; NAPS = not analyzed positive stop; Bulk Asbestos Analysis per 40 CFR 763, Subpart F, Appendix A and ELAP Analysis Protocols 198.1/198.4 for NY samples; Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in NY State (see also EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). National Institute of Standards and Technology Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This report relates ONLY to the items tested. ELAP #11480, Vt. Cert. #AL016055

Reviewed By:

SciLab Job#: **98-03-5438**
Client Name: JACK EISENBACH ENGINEERING, P.C.

Table I
Summary of Bulk Asbestos Analysis Results
8916; Charlestown

SciLab Sample #	Client Sample# Location	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS ELAP # 11480	** Asbestos % by TEM ELAP # 11480
01	8916-6-001 Boiler #2		---	---	---	---	Chrysotile 28.	NA
02	8916-6-002 Boiler #2		---	---	---	---	NAD	NA
03	8916-6-003 Boiler #2		---	---	---	---	NAD	NA
04	8916-6-004 Boiler #		---	---	---	---	NAD	NA
05	8916-6-005 Boiler #1		---	---	---	---	Chrysotile 80.	NA
06	8916-6-006 Boiler Room		---	---	---	---	Amosite 22. Chrysotile 4.8	NA
07	8916-6-007 Boiler Room		---	---	---	---	Chrysotile 50.	NA
08	8916-6-008 Boiler Room		---	---	---	---	Chrysotile 44.	NA

Reviewed by: _____

PLM analyst: Bonni Mora_____; TEM analyst: Louis Lombardi_____

Quantification should be considered qualitative only (positive or negative) for beginning sample weights of less than 0.1 grams. NAD = no asbestos detected; NA = not analyzed; Trace = <1%; NAPS = not analyzed positive stop; Bulk Asbestos Analysis - PLM per 40 CFR 763, Subpt F, Appd A; - TEM by Chatfield and ELAP Analysis Protocol PLM-198.1/TEM-198.4 for New York samples; Note: TEM resolves all asbestos fibers whereas PLM typically will not resolve fibers <~0.2 microns in diameter.

Reviewed By: _____

98035438

SAMPLE LOG

Jack Eisenbach Engineering, P.C.
291 Genesee Street, Utica, New York 13501
315-735-1916 Fax 315-735-6365

PROJECT: Charlestown - Building #6 PROJECT #: 8916

SAMPLE NUMBER	HOMO ID #	RESULTS (+/-)	MATERIAL SAMPLED	SAMPLE LOCATION
8916-6-001		F	Boiler Packing	Boiler #2
002		F	Packing Cement	Boiler #2
003		F	Firebrick in boiler	Boiler #2
004		F	Packing in boiler peephole	Boiler #2
005		F	Gasket around openings	Boiler #1
006		F	Pipe Insulation	Boiler Room
007		F	Fitting	Boiler Room
008		F	Breeching	Boiler Room
009		N	Brick Mortar	Boiler #3
010		F	Heat ~~Exchanger~~ Exchanger Insulation	Boiler Room
011		F	Mag Pipe Insulation	Backup Generator Room
012		N	Interior Window Caulk	Backup Generator Room
013		N	Interior Window Glazing	Backup Generator Room
014		N	Ext. Door Frame Caulk	
015		F	Wall Plaster	Bathroom
016		F	Ceiling Plaster	"
017		F	Wall Plaster	Pump Room
018		F	Tranite Panel	Transformer Room
019		N	Exterior Window Caulk	
020		N	Exterior Window Glazing	
021		F	Boiler Packing Insulation	Front of Boile #1

Samples Collected By: Tony Scialoone 3/5/98 0915

Accreditation No: AH92-13654

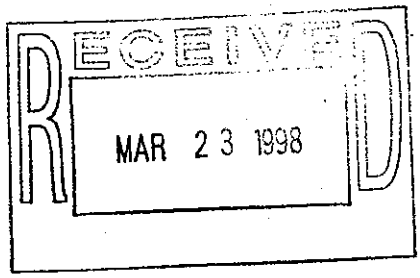
SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 Fax 212/679-9392

March 13, 1998



JACK EISENBACH ENGINEERING, P.C.
Attn: Mr. Eisenbach
291 Genesee Street
Utica, NY 13501

RE: JACK EISENBACH ENGINEERING, P.C.
Job Number 98035893
P.O. # 8916
8916; Charlestown; Building 10 and Transformer Building

Dear Mr. Eisenbach:

Enclosed are the results of Asbestos Analysis - Bulk Protocol of the following JACK EISENBACH ENGINEERING, P.C. samples, received at Scientific Laboratories on Wednesday, March 11, 1998, for a 3 day turnaround:

8916-PR-01, 8916-PR-02, 8916-10-01, 8916-10-02, 8916-10-05, 8916-10-06, 8916-09, 8916-10-10, 8916-10-11, 8916-10-12, 8916-10-13, 8916-10-14, 8916-10-03, 8916-10-07, 8916-10-04, 8916-10-08

The 16 samples, placed in zip lock bag, were shipped to SciLab via Federal Express. JACK EISENBACH ENGINEERING, P.C. requested ELAP PLM/TEM analysis of these samples.

The results of the analyses performed under ELAP 198.1 & 198.4 guidelines are presented within the Summary Table of this report. The presence of matrix reduction data in the Summary Table normally indicates an NOB sample. For NOB samples the individual matrix reduction and TEM analysis results are listed in the TEM report in the Appendix. Complete PLM results for individual samples are presented in the Appendix of this combined report. This report relates ONLY to sample analysis expressed as percent composition by weight and percent asbestos. This report must not be used to claim product endorsement or approval by these laboratories, NVLAP, ELAP or any other associated agency.

SciLab appreciates this opportunity to serve your organization. Please contact us for any further assistance or with any questions.

Sincerely,

Paul Mucha

Paul Mucha
Laboratory Supervisor

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/11/98 **SciLab Job No.** 98035893
Date Examined 3/13/98 **P.O. #** 8916
ELAP Number 11480 **Page** 1 **of** 5
RE: 8916; Charlestown; Building 10 and Transformer Building

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-PR-01	98035893-01	*Yes*	≤ 1. %

Location: North Transformer Building

Description: Grey, Homogeneous, Interior Window Glazing
Asbestos Types: Chrysotile <1. %
Other Material: Non-fibrous 5.5 %

Comment: PLM Analysis Of NOB Inert Residue

8916-PR-02	98035893-02	*No*	NAD

Location: South Transformer Building

Description: Grey, Homogeneous, Wiring
Asbestos Types:
Other Material: Non-fibrous 0.3 %

Comment: PLM Analysis Of NOB Inert Residue

8916-10-01	98035893-03	*Yes*	≤ 1. %

Location: Second Floor

Description: Grey, Homogeneous, Interior Window Glazing
Asbestos Types: Chrysotile <1. %
Other Material: Non-fibrous 8.4 %

Comment: PLM Analysis Of NOB Inert Residue

8916-10-02	98035893-04	*No*	NAD

Location: Second Floor

Description: Grey, Homogeneous, Interior Window Caulking
Asbestos Types:
Other Material: Non-fibrous 13.2 %

Comment: PLM Analysis Of NOB Inert Residue

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/11/98 **SciLab Job No.** 98035893
Date Examined 3/13/98 **P.O. #** 8916
ELAP Number 11480 **Page** 3 **of** 5
RE: 8916; Charlestown; Building 10 and Transformer Building

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-10-11	98035893-09	*Yes*	60 %

Location: Fourth Floor

Description: White, Homogeneous, Mag Pipe Insulation
Asbestos Types: Amosite 50. %, Chrysotile 10. %
Other Material: Non-fibrous 40. %

8916-10-12	98035893-10	*Yes*	4.3 %

Location: Exterior Windows

Description: Grey, Homogeneous, Exterior Window Caulking
Asbestos Types: Anthophyllite 1.6 %, Chrysotile 2.7 %
Other Material: Non-fibrous 49.8 %
Comment: PLM Analysis Of NOB Inert Residue

8916-10-13	98035893-11	*Yes*	≤ 1. %

Location: Exterior Window

Description: Grey, Homogeneous, Exterior Window Glazing
Asbestos Types: Chrysotile <1. %
Other Material: Non-fibrous 4.4 %
Comment: PLM Analysis Of NOB Inert Residue

8916-10-14	98035893-12	*Yes*	8 %

Location: Exterior Door Caulking

Description: Grey, Homogeneous, Caulking
Asbestos Types: Anthophyllite 5. %, Chrysotile 3. %
Other Material: Non-fibrous 42.5 %
Comment: PLM Analysis Of NOB Inert Residue

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/11/98 **SciLab Job No.** 98035893
Date Examined 3/13/98 **P.O. #** 8916
ELAP Number 11480 **Page** 4 **of** 5
RE: 8916; Charlestown; Building 10 and Transformer Building

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-10-03	98035893-13	*No*	NAD
1 **Location:** Second Floor			
Description: Off White, Homogeneous, Sheetrock			
Asbestos Types:			
Other Material: Cellulose 10. %, Fibrous glass 3. %, Non-fibrous 87. %			
8916-10-07	98035893-14	*No*	NAD
1 **Location:** Third Floor			
Description: Off White, Homogeneous, Sheetrock			
Asbestos Types:			
Other Material: Cellulose 20. %, Non-fibrous 80. %			
8916-10-04	98035893-15	*No*	NAD
2 **Location:** Second Floor			
Description: Off White, Homogeneous, Joint Compound			
Asbestos Types:			
Other Material: Cellulose 30. %, Non-fibrous 70. %			
8916-10-08	98035893-16	*No*	NAD
2 **Location:** Third Floor			
Description: Off White, Homogeneous, Joint Compound			
Asbestos Types:			
Other Material: Cellulose Trace, Non-fibrous 100. %			

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/11/98 **SciLab Job No.** 98035893
Date Examined 3/13/98 **P.O. #** 8916
ELAP Number 11480 **Page** 5 **of** 5
RE: 8916; Charlestown; Building 10 and Transformer Building

Reporting Notes:

Analyzed by: Bella Chernis

*NAD/NSD = no asbestos detected; NA = not analyzed; NAPS = not analyzed positive stop; Bulk Asbestos Analysis per 40 CFR 763, Subpart F, Appendix A and ELAP Analysis Protocols 198.1/198.4 for NY samples; Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in NY State (see also EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). National Institute of Standards and Technology Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This report relates ONLY to the items tested. ELAP #11480, Vt. Cert. #AL016055

Reviewed By:

SciLab Job#: **98-03-5893**
Client Name: JACK EISENBACH ENGINEERING, P.C.

Table I
Summary of Bulk Asbestos Analysis Results
8916; Charlestown; Building 10 and Transformer Building

SciLab Sample #	Client Sample# Location	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS ELAP # 11480	** Asbestos % by TEM ELAP # 11480
01	8916-PR-01 North Transformer Building		0.381	17.32	77.17	3.51	Chrysotile <1.	Chrysotile 2.0
02	8916-PR-02 South Transformer Building		0.271	98.15	1.48	0.37	NAD	NAD
03	8916-10-01 Second Floor		0.284	22.18	69.37	6.45	Chrysotile <1.	Chrysotile 2.0
04	8916-10-02 Second Floor		0.325	15.38	71.38	13.23	NAD	NAD
05	8916-10-05 Third Floor		0.407	12.78	80.34	3.88	Chrysotile <1.	Chrysotile 3.0
06	8916-10-06 Third Floor		0.338	8.88	85.21	2.92	Chrysotile <1.	Chrysotile 3.0 Anthophyllite Trace
07	8916-09 Fourth Floor		---	---	---	---	Chrysotile 57.	NA
08	8916-10-10 Fourth Floor		---	---	---	---	NAD	NA

Reviewed by: _____

PLM analyst: Bella Chernis_____; TEM analyst: Louis Lombardi Lou Lombardi

Quantification should be considered qualitative only (positive or negative) for beginning sample weights of less than 0.1 grams. NAD = no asbestos detected; NA = not analyzed; Trace = <1%; NAPS = not analyzed positive stop; Bulk Asbestos Analysis - PLM per 40 CFR 763, Subpt F, Appd A; - TEM by Chatfield and ELAP Analysis Protocol PLM-198.1/TEM-198.4 for New York samples; Note: TEM resolves all asbestos fibers whereas PLM typically will not resolve fibers <~0.2 microns in diameter.

Reviewed By: Lance Luckman Jr

SciLab Job#: **98-03-5893**
Client Name: JACK EISENBACH ENGINEERING, P.C.

Table I
Summary of Bulk Asbestos Analysis Results
8916; Charlestown; Building 10 and Transformer Building

SciLab Sample #	Client Sample# Location	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS ELAP # 11480	** Asbestos % by TEM ELAP # 11480
09	8916-10-11 Fourth Floor		---	---	---	---	Amosite 50. Chrysotile 10.	NA
10	8916-10-12 Exterior Windows		0.336	16.07	29.76	49.87	Anthophyllite 1.6 Chrysotile 2.7	NA
11	8916-10-13 Exterior Window		0.516	23.64	71.90	1.46	Chrysotile <1.	Chrysotile 3.0
12	8916-10-14 Exterior Door Caulking		0.501	33.53	15.97	42.50	Anthophyllite 5. Chrysotile 3.	NA
13	8916-10-03 Second Floor	1	---	---	---	---	NAD	NA
14	8916-10-07 Third Floor	1	---	---	---	---	NAD	NA
15	8916-10-04 Second Floor	2	---	---	---	---	NAD	NA
16	8916-10-08 Third Floor	2	---	---	---	---	NAD	NA

Reviewed by: _____

PLM analyst: Bella Chernis_____; TEM analyst: Louis Lombardi Lou Lombardi

Quantification should be considered qualitative only (positive or negative) for beginning sample weights of less than 0.1 grams. NAD = no asbestos detected; NA = not analyzed; Trace = <1%; NAPS = not analyzed positive stop; Bulk Asbestos Analysis - PLM per 40 CFR 763, Subpt F, Appd A; - TEM by Chatfield and ELAP Analysis Protocol PLM-198.1/TEM-198.4 for New York samples; Note: TEM resolves all asbestos fibers whereas PLM typically will not resolve fibers <~0.2 microns in diameter.

Reviewed By: Karen Luchsinger

98035893

JACK EISENBACH ENGINEERING, P.C.

291 GENESEE STREET, UTICA, NEW YORK 13501 • 315•735•1916 • FAX 315•735•6365

CLIENT: Charlestown
ADDRESS:

PROJECT #: 8916
DATE(S) COLLECTED: 3-10-98
SAMPLES COLLECTED BY: Tony Scialpone

LABORATORY: SciLab

TYPE of ANALYSIS

ASBESTOS BULK	
PLM Only	
TEM Only	
PLM/ TEM As Required By ELAP	X

ASBESTOS AIR	
PCM	
TEM AHERA	
TEM NIOSH 7402	

LEAD	
AA NIOSH 7082	

TURNAROUND TIME

RUSH		72 Hour	X	OTHER	

CHAIN OF CUSTODY

	PRINTED NAME	SIGNATURE	AFFILIATION	DATE	# OF SAMPLES
REMITTED BY:	Tony Scialpone	TS	JEE	3/10/98	16
RECEIVED BY:	Alejandra Lopez	AL	Scilab	3/11/98 1345	(16)
REMITTED BY:					
RECEIVED BY:					
REMITTED BY:					
RECEIVED BY:					

PLEASE FAX RESULTS ASAP TO (315) 735 - 6365, ATTN: TONY

NOTES:

Please do positive stops on sample #s 8916-10-03, 10-07 and 8916-10-04, 10-08

98035898

SAMPLE LOG

Jack Eisenbach Engineering, P.C.
291 Genesee Street, Utica, New York 13501
315-735-1916 Fax 315-735-6365

PROJECT: Charlestown - building 10 + Transformer Bldgs. PROJECT #: 8916

SAMPLE NUMBER	HOMO ID #	RESULTS (+/-)	MATERIAL SAMPLED	SAMPLE LOCATION	
8916-PR-01	1	+ W	INTERIOR WINDOW GLAZING	NORTH TRANSFORMER BLDG.	
PR-02		− W	WIRING	SOUTH " "	
8916-10-01		+ W	INT. WINDOW GLAZING	Second Floor	
10-02		− W	INT. WINDOW CAULK	"	
10-05		+ W	INT. WINDOW GLAZING	Third Floor	
10-06		+ W	INT. WINDOW CAULK	"	
10-09		+	FITTING	Fourth Floor	
10-10		−	CEILING TILE (2×4 DROP)	"	
10-11		+	MAG. PIPE INSULATION	"	
10-12		+ W	EXT. WINDOW CAULK		
10-13		+ W	EXT. WINDOW GLAZING		
10-14		+ W	EXT. ~~WINDOW~~ DOOR CAULK		
8916-10-03		−	SHEETROCK	Second Floor	Positive Stop
07		−	"	Third Floor	
8916-10-04		−	JOINT COMPOUND	Second Floor	Positive Stop
08		−	" "	Third Floor	

Samples Collected By: Tony Scialdone

Accreditation No: AH92-13654

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 Fax 212/679-9392

RECEIVED
MAR - 9 1998

March 2, 1998

JACK EISENBACH ENGINEERING, P.C.
Attn: Mr. Eisenbach
291 Genesee Street
Utica, NY 13501

RE: JACK EISENBACH ENGINEERING, P.C.
Job Number 98026848
P.O. # 8916
8916; Charlestown; Building #11

Dear Mr. Eisenbach:

Enclosed are the results of Asbestos Analysis - Bulk Protocol of the following JACK EISENBACH ENGINEERING, P.C. samples, received at Scientific Laboratories on Saturday, February 28, 1998, for a 3 day turnaround:

8916-11-001, 8916-11-002, 8916-11-005, 8916-11-005B, 8916-11-006, 8916-11-007, 8916-11-008, 8916-11-009, 8916-11-010, 8916-11-011, 8916-11-012, 8916-11-013, 8916-11-014, 8916-11-015, 8916-11-017, 8916-11-003, 8916-11-016, 8916-11-018, 8916-11-004, 8916-11-023, 8916-11-022, 8916-11-019, 8916-11-025

The 23 samples, placed in zip lock bag, were shipped to SciLab via Federal Express. JACK EISENBACH ENGINEERING, P.C. requested ELAP PLM/TEM analysis of these samples.

The results of the analyses performed under ELAP 198.1 & 198.4 guidelines are presented within the Summary Table of this report. The presence of matrix reduction data in the Summary Table normally indicates an NOB sample. For NOB samples the individual matrix reduction and TEM analysis results are listed in the TEM report in the Appendix. Complete PLM results for individual samples are presented in the Appendix of this combined report. This report relates ONLY to sample analysis expressed as percent composition by weight and percent asbestos. This report must not be used to claim product endorsement or approval by these laboratories, NVLAP, ELAP or any other associated agency.

SciLab appreciates this opportunity to serve your organization. Please contact us for any further assistance or with any questions.

Sincerely,

Paul Mucha

Paul Mucha
Laboratory Supervisor

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 2/28/98
Date Examined 3/2/98
ELAP Number 11480

SciLab Job No. 98026848
P.O. # 8916
Page 1 **of** 6

RE: 8916; Charlestown; Building #11

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-11-001	98026848-01	*Yes*	33 %

Location: Welding Equipment Room

Description: Grey, Homogeneous, Cementitious, Transite
Asbestos Types: Chrysotile 33. %
Other Material: Non-fibrous 67. %

8916-11-002	98026848-02	*No*	NAD

Location: Welding Equipment Room

Description: Black/Tan, Homogeneous, Cementitious, Fire Brick
Asbestos Types:
Other Material: Non-fibrous 100. %

8916-11-005	98026848-03	*Yes*	6.5 %

Location: Boat Storage

Description: Green, Homogeneous, Cementitious, 9x9 Floor Tile
Asbestos Types: Chrysotile 6.5 %
Other Material: Non-fibrous 11.5 %
Comment: PLM Analysis Of NOB Inert Residue

8916-11-005B	98026848-04	*No*	NAD

Location: Boat Storage

Description: Black, Homogeneous, Mastic
Asbestos Types:
Other Material: Non-fibrous 38. %
Comment: PLM Analysis Of NOB Inert Residue

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 2/28/98 **SciLab Job No.** 98026848
Date Examined 3/2/98 **P.O. #** 8916
ELAP Number 11480 **Page** 3 **of** 6
RE: 8916; Charlestown; Building #11

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-11-010	98026848-09	*Yes*	≤ 1. %

Location: Large Equip Storage

Description: Grey, Homogeneous, Cementitious, Window Glazing
Asbestos Types: Chrysotile <1. %
Other Material: Non-fibrous 5.1 %

Comment: PLM Analysis Of NOB Inert Residue

8916-11-011	98026848-10	*Yes*	29 %

Location: Large Equip Storage

Description: Black, Homogeneous, Cementitious, Transite
Asbestos Types: Chrysotile 29. %
Other Material: Non-fibrous 71. %

8916-11-012	98026848-11	*No*	NAD

Location: Boat Storage

Description: Grey, Homogeneous, Cementitious, Fitting
Asbestos Types:
Other Material: Cellulose 1. %, Fibrous glass 30. %, Non-fibrous 69. %

8916-11-013	98026848-12	*Yes*	2.6 %

Location: Outside

Description: Off White, Homogeneous, Cementitious, Window Glazing
Asbestos Types: Amosite 2.6 %
Other Material: Non-fibrous 19.2 %

Comment: PLM Analysis Of NOB Inert Residue

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 2/28/98 **SciLab Job No.** 98026848
Date Examined 3/2/98 **P.O. #** 8916
ELAP Number 11480 **Page** 4 **of** 6
RE: 8916; Charlestown; Building #11

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-11-014	98026848-13	*Yes*	4 %

Location: Outside

Description: Grey, Homogeneous, Window Caulking
Asbestos Types: Chrysotile 4. %
Other Material: Non-fibrous 6.3 %

Comment: PLM Analysis Of NOB Inert Residue

8916-11-015	98026848-14	*Yes*	≤ 1. %

Location: Outside Car Stor Entrance

Description: Grey, Homogeneous, Caulk
Asbestos Types: Chrysotile <1. %
Other Material: Non-fibrous 3.6 %

Comment: PLM Analysis Of NOB Inert Residue

8916-11-017	98026848-15	*Yes*	50 %

Location: Outside Car Stor. Entrance

Description: Grey, Homogeneous, Cementitious, Exterior Fitting
Asbestos Types: Chrysotile 50. %
Other Material: Non-fibrous 50. %

8916-11-003	98026848-16	*No*	NAD
A			

Location: Welding Room

Description: Brown/Off White, Heterogeneous, Cementitious, Sheetrock
Asbestos Types:
Other Material: Cellulose 10. %, Fibrous glass 5. %, Non-fibrous 85. %

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 2/28/98 **SciLab Job No.** 98026848
Date Examined 3/2/98 **P.O. #** 8916
ELAP Number 11480 **Page** 5 **of** 6
RE: 8916; Charlestown; Building #11

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-11-016	98026848-17	*No*	NAD
A	**Location:** Room Off Car Storage		
	Description: Brown/Off White, Heterogeneous, Cementitious, Sheetrock		
	Asbestos Types:		
	Other Material: Cellulose 10. %, Fibrous glass 5. %, Non-fibrous 85. %		
8916-11-018	98026848-18	*No*	NAD
A	**Location:** Hall		
	Description: Brown/Off White, Heterogeneous, Cementitious, Sheetrock		
	Asbestos Types:		
	Other Material: Cellulose 10. %, Fibrous glass 5. %, Non-fibrous 85. %		
8916-11-004	98026848-19	*No*	NAD
B	**Location:** Car Storage		
	Description: White, Homogeneous, Cementitious, Joint Compound		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
8916-11-023	98026848-20	*No*	NAD
B	**Location:** Car Storage		
	Description: White, Homogeneous, Cementitious, Joint Compound		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		
8916-11-022	98026848-21	*No*	NAD
B	**Location:** Hallway		
	Description: White, Homogeneous, Cementitious, Joint Compound		
	Asbestos Types:		
	Other Material: Non-fibrous 100. %		

8/23

98026848

JACK EISENBACH ENGINEERING, P.C.

291 GENESEE STREET, UTICA, NEW YORK 13501 • 315•735•1916 • FAX 315•735•6365

CLIENT: CHARLESTOWN

ADDRESS: BUILDING #11

LABORATORY: SCI LAB

PROJECT #: 8916

DATE(S) COLLECTED: 2-27-98

SAMPLES COLLECTED BY: Tony Scialdone / Jim Wheeler

TYPE of ANALYSIS

ASBESTOS BULK		ASBESTOS AIR		LEAD	
PLM Only		PCM		AA NIOSH 7082	
TEM Only		TEM AHERA			
PLM/ TEM As Required By ELAP	■	TEM NIOSH 7402			

TURNAROUND TIME

RUSH		72 Hour	■	OTHER	

CHAIN OF CUSTODY

	PRINTED NAME	SIGNATURE	AFFILIATION	DATE	# OF SAMPLES
REMITTED BY:	Tony Scialdone	Tony Scialdone	JEG	2/27/98	22
RECEIVED BY:	Sitelor		SciLabs	2/28/98	~~23~~
REMITTED BY:					
RECEIVED BY:					
REMITTED BY:					
RECEIVED BY:					

PLEASE FAX RESULTS ASAP TO (315) 735 - 6365, ATTN: TONY

NOTES: Please do positive stops as indicated on sample log

Sample #'s 8916-003, 016, 018
8916-004, 023, 022
8916-019, 025
} Positive Stops

98026848

SAMPLE LOG

Jack Eisenbach Engineering, P.C.
291 Genesee Street, Utica, New York 13501
315-735-1916 Fax 315-735-6365

2/26/98

PROJECT: Charlestown - Building #11

PROJECT #: 8916

SAMPLE NUMBER	HOMO ID #	RESULTS (+/-)	MATERIAL SAMPLED	SAMPLE LOCATION	
8916-11-001		F	TRANSITE TABLE	Welding Equipment Room	
002		F	FIREBRICK	Welding Equipment Room	
005	/005 IM	N	9x9 FLOOR TILE / MASTIC	Boat Storage	
006		F	VAPOR BARRIER	Boat Storage	
007		F	PIPE INSULATION	Boat Storage	
008		N	F.G. FLOORING	Large Equip. Storage	
009		N	WINDOW CAULK	"	
010		N	WINDOW GLAZING	"	
011		F	TRANSITE TABLE	"	
012		F	FITTING	Boat Storage	
013		N	EXTERIOR WINDOW GLAZING	Outside	
014		N	EXTERIOR WINDOW CAULK	Outside	
015		N	DOOR FRAME CAULK	Outside - Car Stor. Entrance	
017		F	EXTERIOR FITTING	"	
003		F	SHEETROCK	Welding Room	POSITIVE STOP
016		F	"	Room off car storage	POSITIVE STOP
018		F	"	Hall	POSITIVE STOP
004		F	JOINT COMPOUND	Car Storage	POSITIVE STOP
023		F	"	Car Storage	POSITIVE STOP
022		F	"	Hallway	POSITIVE STOP
019		F	CONCRETE CEILING	Hannibal Storage	POSITIVE STOP
025		F	"	Hannibal Office	POSITIVE STOP

Samples Collected By: Tony Sciaidone

Accreditation No: AH92-13654

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 Fax 212/679-9392

March 9, 1998

JACK EISENBACH ENGINEERING, P.C.
Attn: Mr. Eisenbach
291 Genesee Street
Utica, NY 13501

RE: JACK EISENBACH ENGINEERING, P.C.
Job Number 98035499
P.O. # 8916
8916; Charlestown; Building #12

Dear Mr. Eisenbach:

Enclosed are the results of Asbestos Analysis - Bulk Protocol of the following JACK EISENBACH ENGINEERING, P.C. samples, received at Scientific Laboratories on Friday, March 6, 1998, for a 3 day turnaround:

8916-12-001, 8916-12-002, 8916-12-003, 8916-12-004, 8916-12-005, 8916-12-006, 8916-12-007, 8916-12-008, 8916-12-009, 8916-12-010, 8916-12-011, 8916-12-012, 8916-12-013, 8916-12-014, 8916-12-015, 8916-12-016, 8916-12-017, 8916-12-018

The 18 samples, placed in zip lock bag, were shipped to SciLab via Federal Express. JACK EISENBACH ENGINEERING, P.C. requested ELAP PLM/TEM analysis of these samples.

The results of the analyses performed under ELAP 198.1 & 198.4 guidelines are presented within the Summary Table of this report. The presence of matrix reduction data in the Summary Table normally indicates an NOB sample. For NOB samples the individual matrix reduction and TEM analysis results are listed in the TEM report in the Appendix. Complete PLM results for individual samples are presented in the Appendix of this combined report. This report relates ONLY to sample analysis expressed as percent composition by weight and percent asbestos. This report must not be used to claim product endorsement or approval by these laboratories, NVLAP, ELAP or any other associated agency.

SciLab appreciates this opportunity to serve your organization. Please contact us for any further assistance or with any questions.

Sincerely,

Paul Mucha
Laboratory Supervisor

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/6/98
Date Examined 3/8/98
ELAP Number 11480

SciLab Job No. 98035499
P.O. # 8916
Page 1 **of** 5

RE: 8916; Charlestown; Building #12

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-12-001	98035499-01	*Yes*	≤ 1. %

Location: Charlie G Bar

Description: White, Homogeneous, Interior Window Glazing
Asbestos Types: Tremolite <1. %
Other Material: Non-fibrous <30. %

Comment: PLM analysis of NOB inert residue

8916-12-002	98035499-02	*No*	NAD

Location: Charlie G Bar

Description: Off White, Homogeneous, Interior Window Caulking
Asbestos Types:
Other Material: Non-fibrous 64. %

Comment: PLM analysis of NOB inert residue

8916-12-003	98035499-03	*Yes*	31 %

Location: Charlie G Bar-Office

Description: Grey, Homogeneous, Aircell Insulation
Asbestos Types: Chrysotile 31. %
Other Material: Cellulose 30. %, Non-fibrous 39. %

8916-12-004	98035499-04	*No*	NAD

Location: Charlie G Bar-Kitchen

Description: White, Homogeneous, Joint Compound
Asbestos Types:
Other Material: Non-fibrous 100. %

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/6/98
Date Examined 3/8/98
ELAP Number 11480
RE: 8916; Charlestown; Building #12

SciLab Job No. 98035499
P.O. # 8916

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-12-005	98035499-05	*No*	NAD

Location: Charlie G Bar-Kitchen

Description: Brown/Off White, Homogeneous, Sheetrock
Asbestos Types:
Other Material: Cellulose 10. %, Fibrous glass 10. %, Non-fibrous 80. %

8916-12-006	98035499-06	*No*	NAD

Location: Charlie G Bar-Office

Description: White, Homogeneous, Joint Compound
Asbestos Types:
Other Material: Non-fibrous 100. %

8916-12-007	98035499-07	*No*	NAD

Location: Charlie G Bar-Office

Description: Brown/Off White, Homogeneous, Sheetrock
Asbestos Types:
Other Material: Cellulose 15. %, Non-fibrous 85. %

8916-12-008	98035499-08	*Yes*	5 %

Location: Charlie G's Dining Rm.

Description: Grey, Homogeneous, Exterior Window Caulking
Asbestos Types: Chrysotile 5. %
Other Material: Non-fibrous 15. %

Comment: PLM analysis of NOB inert residue

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/6/98
Date Examined 3/8/98
ELAP Number 11480
SciLab Job No. 98035499
P.O. # 8916

RE: 8916; Charlestown; Building #12

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-12-009	98035499-09	*Yes*	2.8 %

Location: Charlie G's Dining Rm.

Description: Off White, Homogeneous, Exterior Window Glazing
Asbestos Types: Chrysotile 2.8 %
Other Material: Non-fibrous 5.6 %

Comment: PLM analysis of NOB inert residue

8916-12-010	98035499-10	*Yes*	57 %

Location: Bar

Description: Grey, Homogeneous, Packing Material Lights
Asbestos Types: Chrysotile 57. %
Other Material: Non-fibrous 43. %

8916-12-011	98035499-11	*No*	NAD

Location: 4th Flr.

Description: Off White, Homogeneous, Interior Window Glazing
Asbestos Types:
Other Material: Non-fibrous 9.2 %

Comment: PLM analysis of NOB inert residue

8916-12-012	98035499-12	*Yes*	1.8 %

Location: 4th Flr.

Description: Off White, Homogeneous, Interior Window Caulking
Asbestos Types: Chrysotile 1.8 %
Other Material: Non-fibrous 2.2 %

Comment: PLM analysis of NOB inert residue

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/6/98
Date Examined 3/8/98
ELAP Number 11480

SciLab Job No. 98035499
P.O. # 8916

RE: 8916; Charlestown; Building #12

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-12-013	98035499-13	*Yes*	66 %

Location: Middle/4th Flr.

Description: Grey, Homogeneous, Fitting Insulation
Asbestos Types: Chrysotile 66. %
Other Material: Non-fibrous 44. %

8916-12-014	98035499-14	*No*	NAD

Location: 4th Flr.

Description: Brown/Off White, Homogeneous, Sheetrock
Asbestos Types:
Other Material: Cellulose 10. %, Fibrous glass 10. %, Non-fibrous 80. %

8916-12-015	98035499-15	*No*	NAD

Location: 4th Flr.

Description: Grey, Homogeneous, 2x4 Ceiling Tile
Asbestos Types:
Other Material: Cellulose 30. %, Fibrous glass 40. %, Non-fibrous 30. %

8916-12-016	98035499-16	*Yes*	6.8 %

Location: 1st Flr.

Description: Grey, Homogeneous, Exterior Door Caulking
Asbestos Types: Chrysotile 6.8 %
Other Material: Non-fibrous 25.2 %

Comment: PLM analysis of NOB inert residue

SciLab

Environmental Lab Services

SCIENTIFIC LABORATORIES, INC.

117 E. 30th St. NY, NY 10016 212/679-8600 FAX: 212/679-9392

PLM Bulk Asbestos Report

JACK EISENBACH ENGINEERING, P.C.
Attn: Jack Eisenbach
291 Genesee Street
Utica, NY 13501

Date Received 3/6/98
Date Examined 3/8/98
ELAP Number 11480

SciLab Job No. 98035499
P.O. # 8916
Page 5 **of** 5

RE: 8916; Charlestown; Building #12

Client No. / HGA	Lab No.	Asbestos Present	Total % Asbestos
8916-12-017	98035499-17	*Yes*	8.1 %

Location: 1st Flr.

Description: Grey, Homogeneous, Exterior Window Caulking
Asbestos Types: Chrysotile 8.1 %
Other Material: Non-fibrous 17.9 %

Comment: PLM analysis of NOB inert residue

8916-12-018	98035499-18	*Yes*	1.4 %

Location: 1st Flr.

Description: Grey, Homogeneous, Exterior Window Glazing
Asbestos Types: Chrysotile 1.4 %
Other Material: Non-fibrous 1.7 %

Comment: PLM analysis of NOB inert residue

Reporting Notes:

Analyzed by: John Curulli

*NAD/NSD = no asbestos detected; NA = not analyzed; NAPS = not analyzed positive stop; Bulk Asbestos Analysis per 40 CFR 763, Subpart F, Appendix A and ELAP Analysis Protocols 198.1/198.4 for NY samples; Note: PLM is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. TEM is currently the only method that can be used to determine if this material can be considered or treated as non-asbestos-containing in NY State (see also EPA Advisory for floor tile, FR 59, 146, 38970, 8/1/94). National Institute of Standards and Technology Accreditation requirements mandate that this report must not be reproduced except in full with the approval of the laboratory. This report relates ONLY to the items tested. ELAP #11480, Vt. Cert. #AL016055

Reviewed By:

SciLab Job#: **98-03-5499**
Client Name: JACK EISENBACH ENGINEERING, P.C.

Table I
Summary of Bulk Asbestos Analysis Results
8916; Charlestown; Building #12

SciLab Sample #	Client Sample# Location	HG Area	Sample Weight (gram)	Heat Sensitive Organic %	Acid Soluble Inorganic %	Insoluble Non-Asbestos Inorganic %	** Asbestos % by PLM/DS ELAP # 11480	** Asbestos % by TEM ELAP # 11480
01	8916-12-001 Charlie G Bar		1.128	12.77	56.21	25.03	Tremolite <1.	Tremolite 6.0
02	8916-12-002 Charlie G Bar		0.932	7.51	28.76	63.73	NAD	NAD
03	8916-12-003 Charlie G Bar-Office		---	---	---	---	Chrysotile 31.	NA
04	8916-12-004 Charlie G Bar-Kitchen		---	---	---	---	NAD	NA
05	8916-12-005 Charlie G Bar-Kitchen		---	---	---	---	NAD	NA
06	8916-12-006 Charlie G Bar-Office		---	---	---	---	NAD	NA
07	8916-12-007 Charlie G Bar-Office		---	---	---	---	NAD	NA
08	8916-12-008 Charlie G's Dining Rm.		0.587	37.65	40.20	22.15	Chrysotile 5.	NA

Reviewed by: _____

PLM analyst: John Curulli_____; TEM analyst: Louis Lombardi_____

Quantification should be considered qualitative only (positive or negative) for beginning sample weights of less than 0.1 grams. NAD = no asbestos detected; NA = not analyzed; Trace = <1%; NAPS = not analyzed positive stop; Bulk Asbestos Analysis - PLM per 40 CFR 763, Subpt F, Appd A; - TEM by Chatfield and ELAP Analysis Protocol PLM-198.1/TEM-198.4 for New York samples; Note: TEM resolves all asbestos fibers whereas PLM typically will not resolve fibers <~0.2 microns in diameter.

Reviewed By: _____

Jack Eisenbach Engineering, P.C.
291 Genesee Street, Utica, New York 13501
315-735-1916 Fax 315-735-6365

SAMPLE LOG

PROJECT: Charlestown - Building #12 PROJECT #: 8916

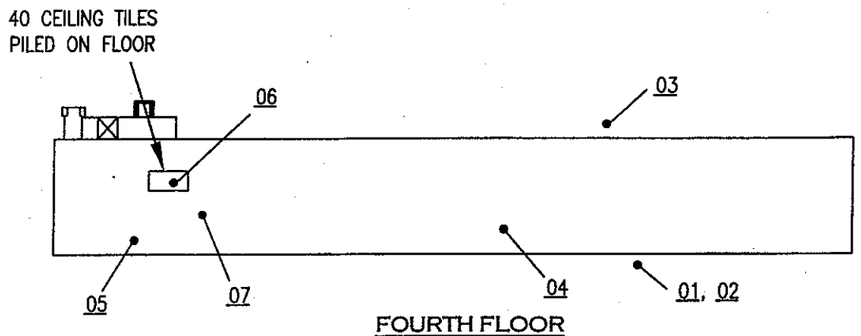
SAMPLE NUMBER	*HOMO ID #*	*RESULTS (+/-)*	*MATERIAL SAMPLED*	*SAMPLE LOCATION*
8916-12-001			INTERIOR WINDOW GLAZING	CHARLIE G BAR
002			" " CAULK	— " —
003			AIRCELL INSULATION	— " — OFFICE
004			JOINT COMPOUND	— " — KITCHEN
005			SHEETROCK	— " — "
006			JOINT COMPOUND	— " — OFFICE
007			SHEETROCK	— " — "
008			EXTERIOR WINDOW CAULK	CHARLIE G'S DINING RM
009			" " GLAZING	— " —
010			PACKING MATERIAL IN LIGHTS	BAR
011			INTERIOR WINDOW GLAZING	4th FLOOR
012			" " CAULK	4th FLOOR
013			FITTING INSULATION	Middle Rm - 4th Floor
014			SHEETROCK	4th FLOOR
015			2x4 CEILING TILE	4th FLOOR
016			EXT. DOOR CAULK	1st Floor
017			EXT. WINDOW CAULK	"
018			" " GLAZING	"

Samples Collected By: TONY SCIALDONE

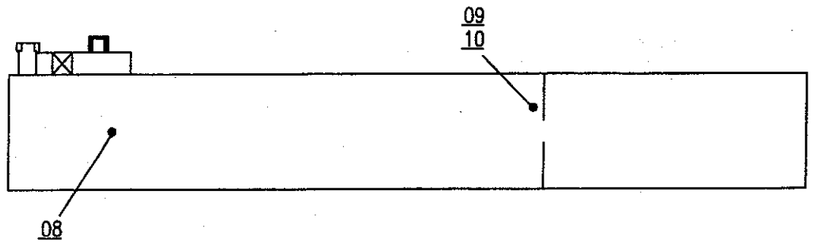
Accreditation No: AH92 - 13654

5/6/05 9:40am

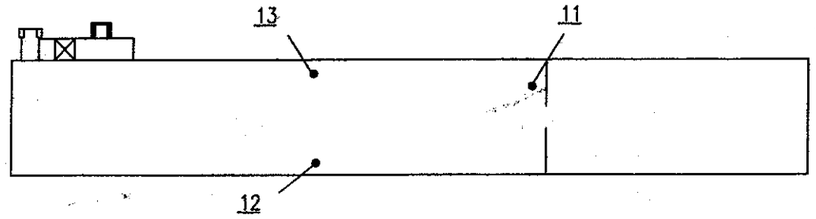
98005499



FOURTH FLOOR



THIRD FLOOR



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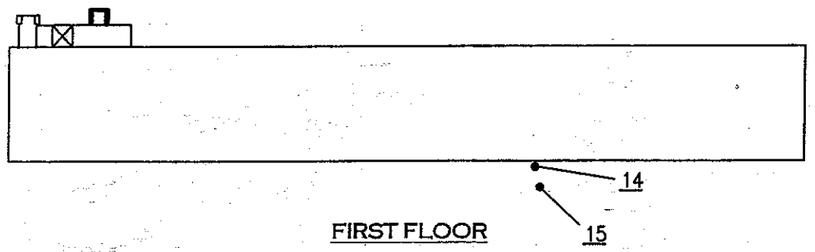


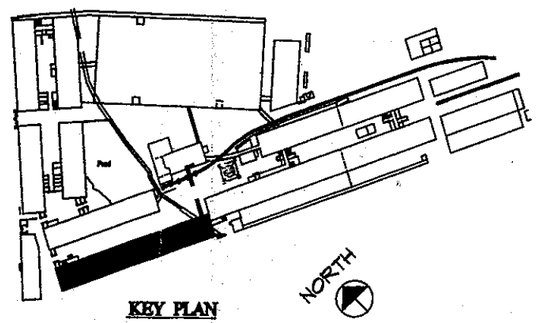
FIRST FLOOR

NOTE:

1 ALL SAMPLE NUMBERS ARE PRECEDED BY 8916-4--

LEGEND

XX SAMPLE NUMBER



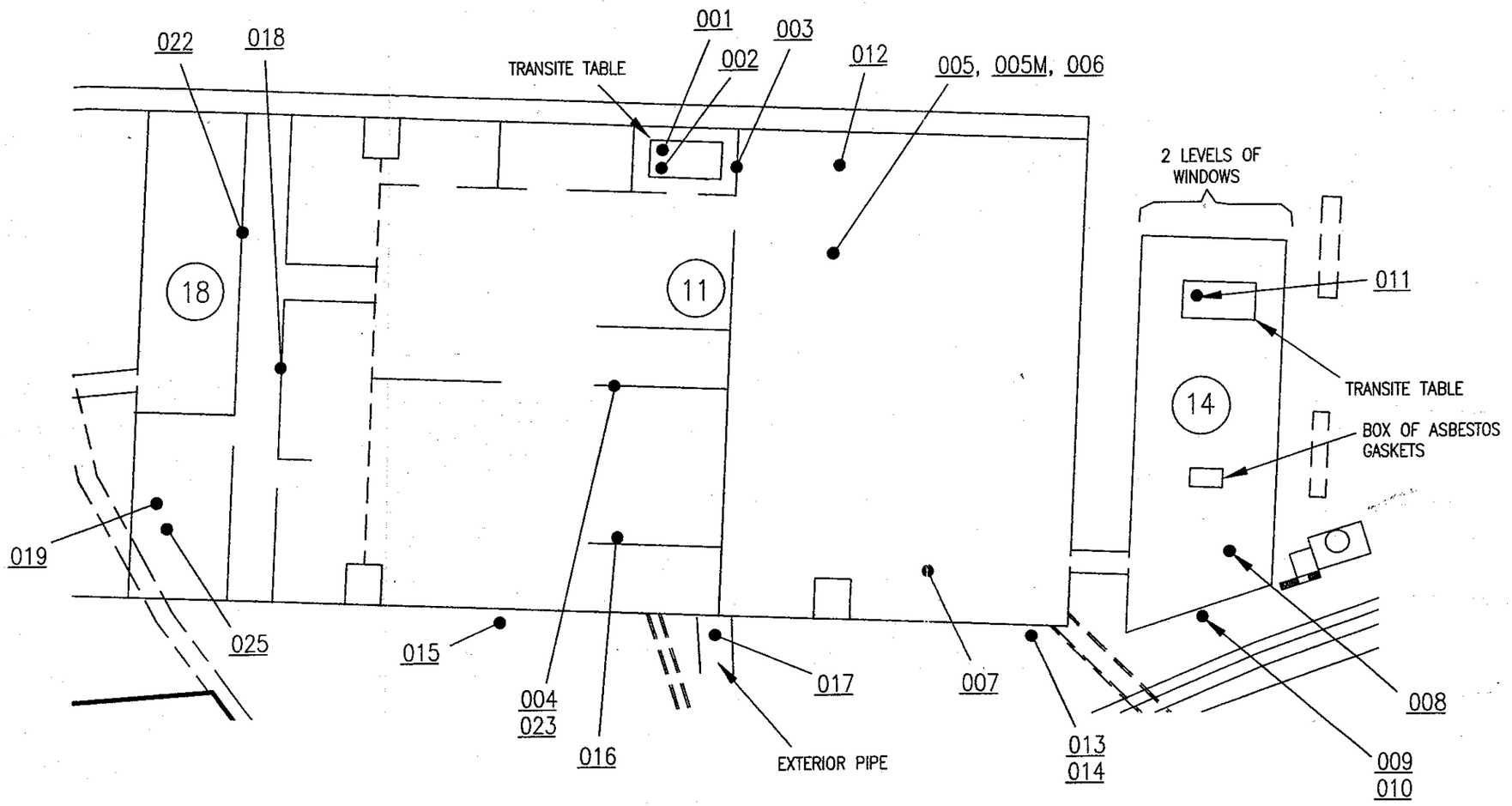
KEY PLAN

SL-2

CHARLES TOWN
BUILDING 4
SAMPLE LOCATIONS

DATE: 5-14-95
DRAWN: JNS
NO.: 8916

JACK EISENBACH ENGINEERING, P.C.
291 Genesee Street, Utica, NY 13501 315-735-1916
168 Carlton Street, Buffalo, NY 14203 716-882-3903

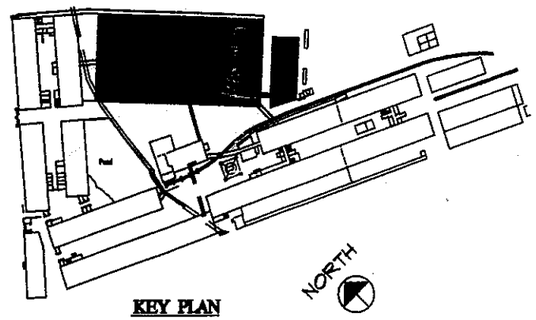


LEGEND

XXX SAMPLE NUMBER

NOTE:

1 ALL SAMPLE NUMBERS ARE PRECEDED BY 8916-11-



KEY PLAN

CHARLES TOWN BUILDINGS 11, 14 & 18 SAMPLE LOCATIONS

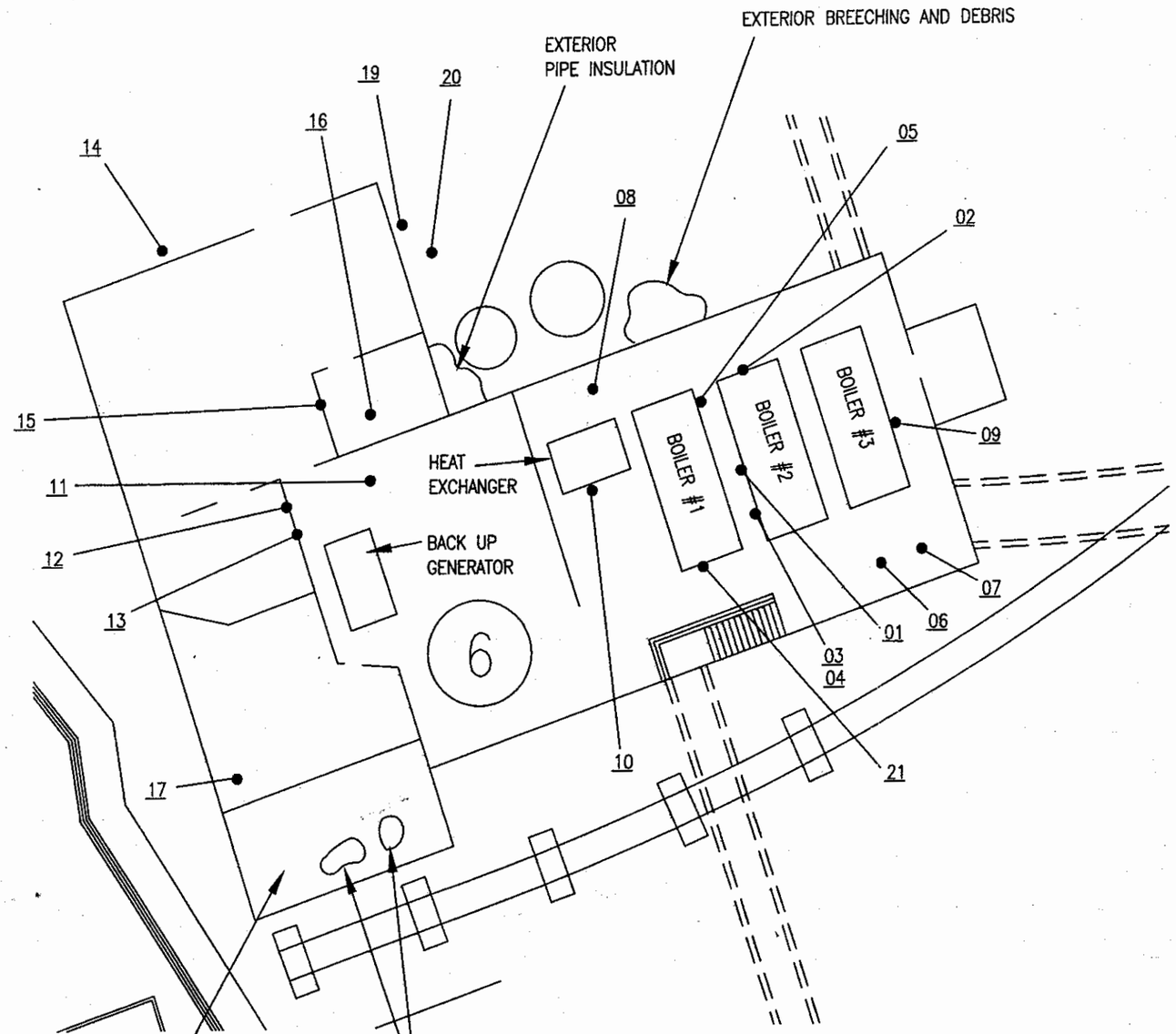
SL-1

DATE: 5-14-95

DRAWN: JNS

NO.: 8916

JACK EISENBACH ENGINEERING, P.C.
291 Genesee Street, Utica, NY 13501 315-735-1916
168 Carlton Street, Buffalo, NY 14263 716-882-3903

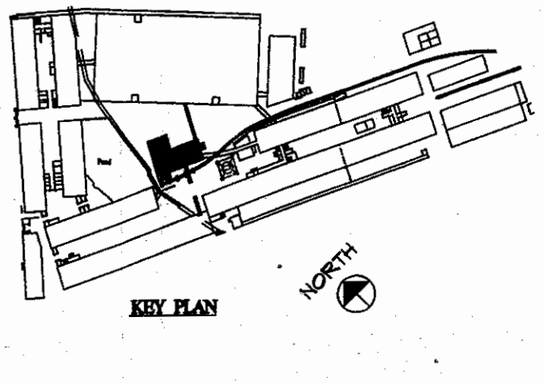


NOTE:

1 ALL SAMPLE NUMBERS ARE PRECEDED BY 8916-6--

LEGEND

XX SAMPLE NUMBER



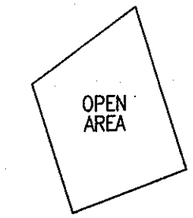
KEY PLAN

CHARLESTOWN
BUILDING 6
SAMPLE LOCATIONS

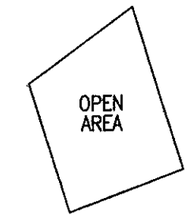
SL-3

DATE: 5-14-95
DRAWN: JWS
NO.: 8916

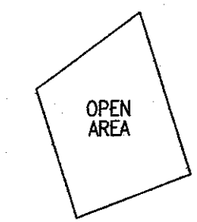
JACK EISENBACH ENGINEERING, P.C.
291 Genesee Street, Utica, NY 13501 315-735-1916
168 Carlton Street, Buffalo, NY 14263 716-882-3803



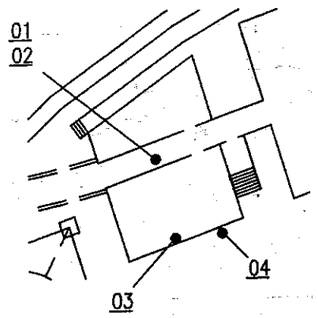
FOURTH FLOOR - 7



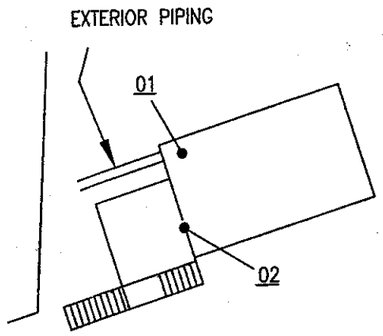
THIRD FLOOR - 7



SECOND FLOOR - 7



FIRST FLOOR - 7



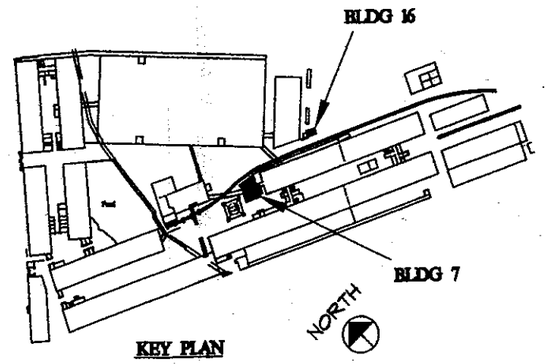
BLDG. - 16

NOTE: - BUILDING 16
1 ALL SAMPLE NUMBERS ARE PRECEDED BY 8916-16-

NOTE: - BUILDING 7
1 ALL SAMPLE NUMBERS ARE PRECEDED BY 8916-7-

LEGEND

XX SAMPLE NUMBER



KEY PLAN

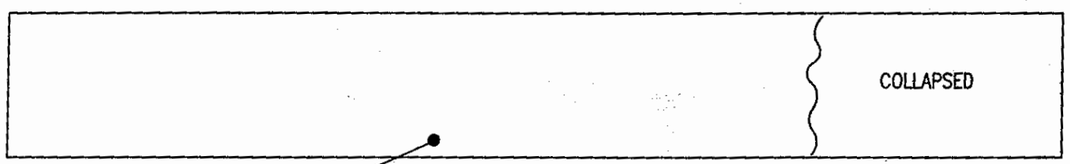
SL-4

CHARLES TOWN
BUILDINGS 7 & 16
SAMPLE LOCATIONS

DATE: 5-15-95
DRAWN: JNS
NO.: 8916

JACK EISENBACH ENGINEERING, P.C.
291 Genesee Street, Utica, NY 13501 315-735-1916
168 Carlton Street, Buffalo, NY 14263 716-882-3903

FOURTH FLOOR



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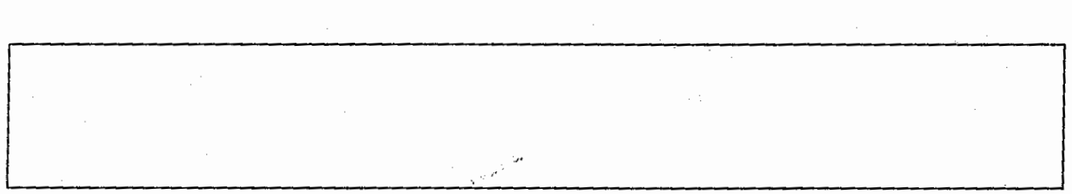

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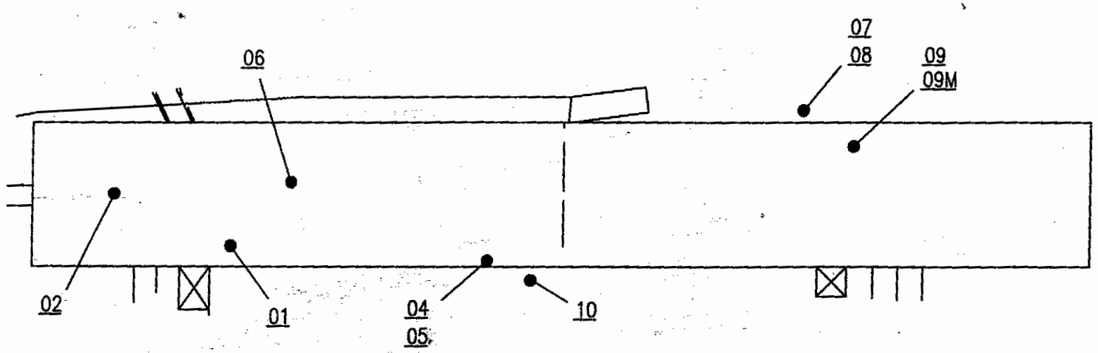


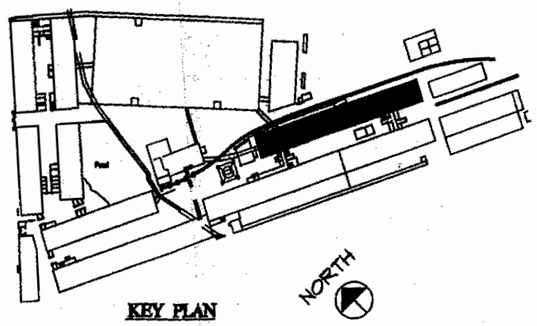
FIRST FLOOR

NOTE:

1 ALL SAMPLE NUMBERS ARE PRECEDED BY 8916-5-

LEGEND

XX SAMPLE NUMBER

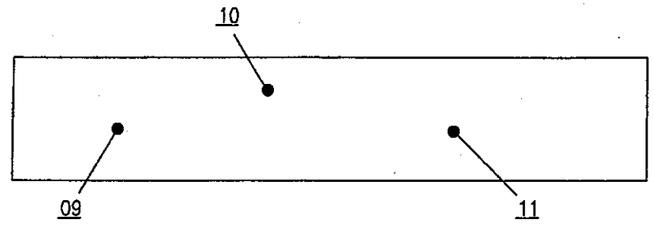


KEY PLAN

CHARLESTOWN
BUILDING 5
SAMPLE LOCATIONS

DATE: 5-15-95
DRAWN: JWS
NO.: 8916

JACK EISENBACH ENGINEERING, P.C.
291 Genesee Street, Utica, NY 13501 315-735-1916
168 Carlton Street, Buffalo, NY 14263 716-882-3903



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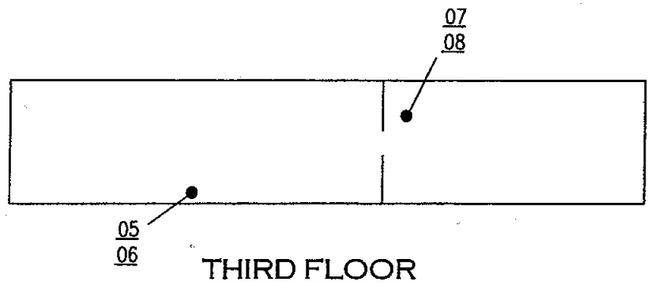

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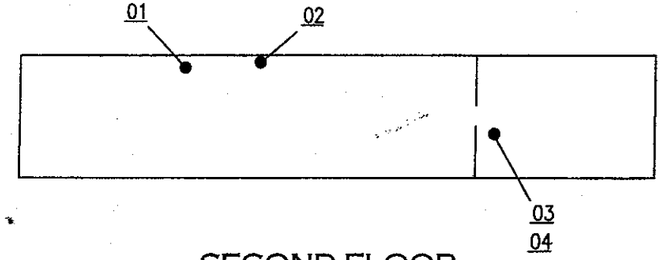

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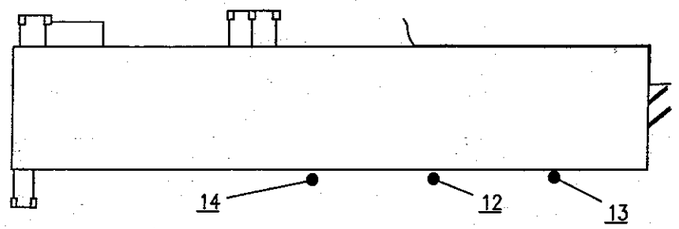


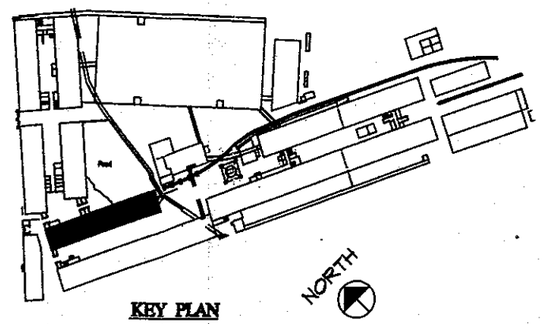
FIRST FLOOR

NOTE: –

1 ALL SAMPLE NUMBERS ARE PRECEDED BY 8916–10–

LEGEND

XX SAMPLE NUMBER



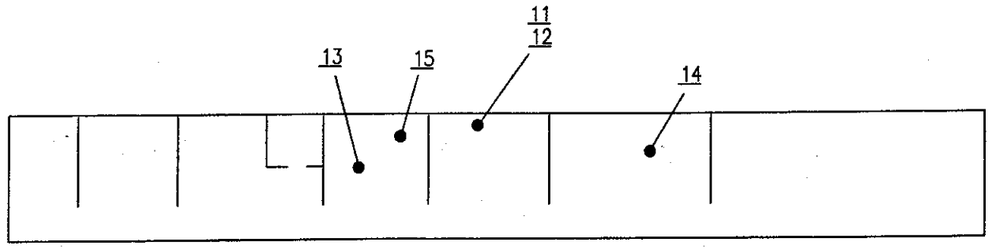
KEY PLAN

SL-6

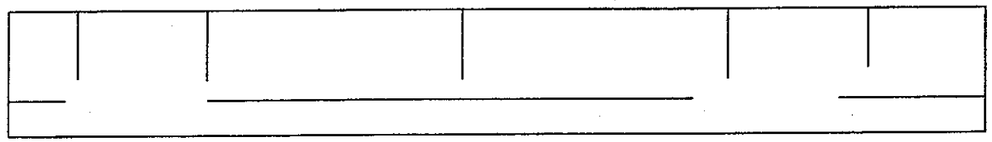
CHARLES TOWN
BUILDING 10
SAMPLE LOCATIONS

DATE: 5-15-95
DRAWN: JWS
NO.: 8916

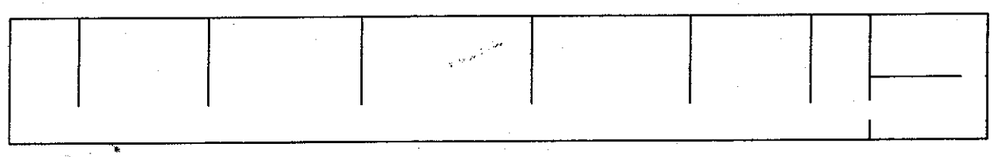
JACK EISENBACH ENGINEERING, P.C.
291 Genesee Street, Utica, NY 13501 315-735-1916
168 Carlton Street, Buffalo, NY 14263 716-882-3903



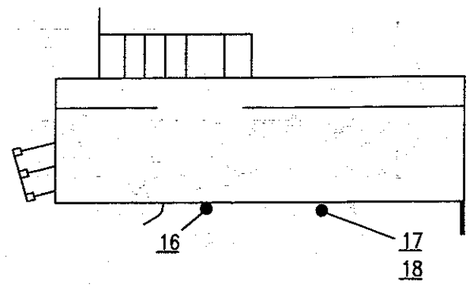
FOURTH FLOOR



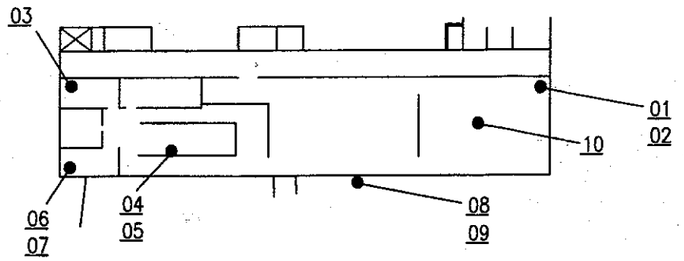
THIRD FLOOR



SECOND FLOOR



FIRST FLOOR SOUTH



FIRST FLOOR NORTH

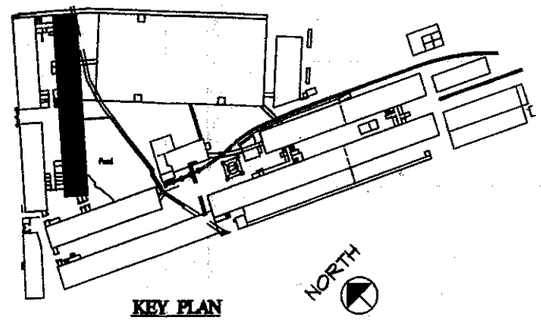
(CHARLIE G. RESTAURANT)

NOTE: -

1 ALL SAMPLE NUMBERS ARE PRECEDED BY 8916-12-

LEGEND

XX SAMPLE NUMBER



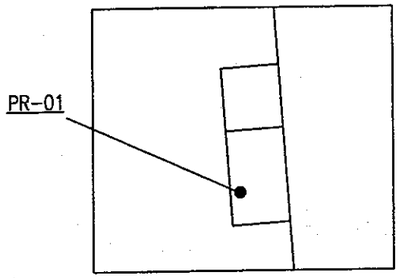
KEY PLAN

CHARLES TOWN
BUILDING 12
SAMPLE LOCATIONS

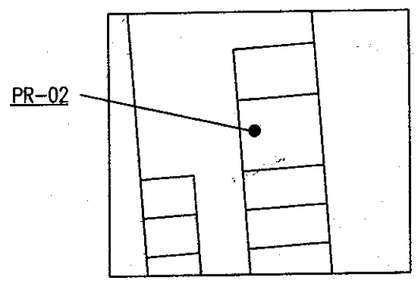
SL-7

DATE: 5-15-95
DRAWN: JWS
NO.: 8916

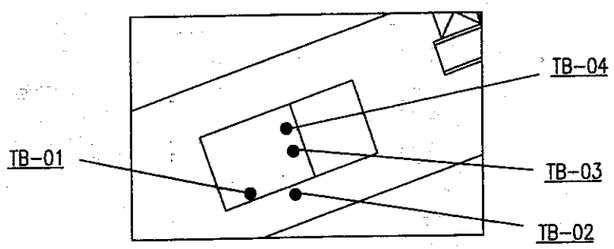
JACK EISENBACH ENGINEERING, P.C.
291 Genesee Street, Utica, NY 13501 315-735-1916
168 Carlton Street, Buffalo, NY 14203 716-882-3803



TRANSFORMER BUILDING 4



TRANSFORMER BUILDING 3



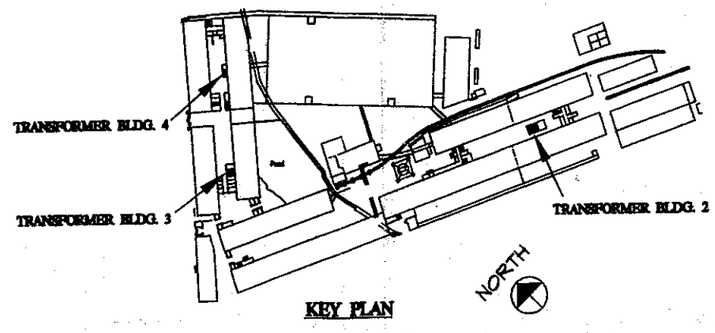
TRANSFORMER BUILDING 2

NOTE: -

1 ALL SAMPLE NUMBERS ARE PRECEDED BY 8916-

LEGEND

XX-XX SAMPLE NUMBER



KEY PLAN

CHARLES TOWN
TRANSFORMER BUILDINGS 2,3 &4
SAMPLE LOCATIONS

SL-8

DATE: 5-15-95
DRAWN: JWS
NO.: 8916

JACK EISENBACH ENGINEERING, P.C.
291 Genesee Street, Utica, NY 13501 315-735-1916
168 Corfton Street, Buffalo, NY 14263 716-882-3903

MUST BE CARRIED ON ASBESTOS PROJECTS

CERTIFICATE NUMBER	
AH 92-13654	
EXPIRES	
SOCIAL SECURITY NUMBER	
126-70-8482	
EYES	HAIR
BLU	BRO
WEIGHT	HEIGHT
175 lbs.	5 ft. 11 in.

ADDRESS CORRESPONDENCE TO:
(include certificate number)
NYS Department of Labor
DOSH - License and Certificate Unit
PO Box 687, New York, NY 10014-0687

010368C

STATE OF NEW YORK
DEPARTMENT OF LABOR
DIVISION OF SAFETY AND HEALTH

ASBESTOS HANDLING CERTIFICATE
AUTHORIZED CLASSES

D - INSPECTOR (11/98)
H - PROJECT MONITOR (11/98)

ANTHONY J SCIALDONE
7 SYCAMORE DRIVE EAST
NEW HARTFORD, NY 13413

RICHARD CUCOLO, Director - For the Commissioner of Labor

DOSH-442 (01/91)

NEW YORK STATE DEPARTMENT OF HEALTH

BARBARA A. DEBUONO, M.D., M.P.H. Commissioner

Expires 12:01 AM April 1, 1999
ISSUED April 1, 1998
REVISED June 25, 1998

CERTIFICATE OF APPROVAL FOR LABORATORY SERVICE

Issued in accordance with and pursuant to section 502 Public Health Law of New York State

Lab ID No.: 11480

Director: DR. ROBERT TOMPKINS
Lab Name: SCIENTIFIC LABORATORIES INC-NEW YORK CITY
Address : 117 EAST 30TH ST
NEW YORK NY 10016

is hereby APPROVED as an Environmental Laboratory for the category

ENVIRONMENTAL ANALYSES/SOLID AND HAZARDOUS WASTE

All approved subcategories and/or analytes are listed below:

Miscellaneous :
Asbestos in Friable Material
Asbestos in Non-Friable Materia

Serial No.: 102787

Wadsworth Center

Property of the New York State Department of Health. Valid only at the address shown.
Must be conspicuously posted. Valid certificate has a red serial number.

DOH-3317 (3/97)

ACTION MEMORANDUM RV1

DATE: AUG 0 8 2011

SUBJECT: Request for a Ceiling Increase, 12-Month Exemption, and $2 Million Exemption for the Removal Action at the Charlestown Mall Site, Village of Frankfort, Herkimer County, New York

FROM: Terry E. Kish, On-Scene Coordinator
Removal Action Branch

TO: Judith A. Enck
Regional Administrator

THRU: Walter E. Mugdan, Director
Emergency and Remedial Response Division

Site ID#: A239

I. PURPOSE

The purpose of this Action Memorandum is to request and document approval of the Ceiling Increase, 12-Month Exemption and $2 Million Exemption at the Charlestown Mall Site (Site), Village of Frankfort, Herkimer County, New York. This is the first U.S. Environmental Protection Agency (EPA) removal action undertaken at the Site. The objective of this removal action is to mitigate the threat of direct contact posed to the public by asbestos contaminated demolition debris present at the Site. This will be accomplished by completing the removal and off-site disposal of the asbestos contaminated debris. The total funding increase requested in this Action Memorandum is $2,192,000, of which, $1,903,000 is from the Regional removal advice of allowance for mitigation contracting. If approved, the new total project ceiling will be increased to $4,061,000, of which, $3,313,000 is for mitigation contracting. Conditions at the Site meet the criteria for a removal action under the Comprehensive Environmental Resource, Compensation and Liability Act (CERCLA) and Section 300.415(b) of the National Contingency Plan (NCP).

removal action.

CONCURRENCES	Name: Charlestown Mall	Date: 6/23/2010		Filename: AM#:0366				
Symbol	ERRD-RAB	ERRD-RAB	ERRD-RAB	ORC-NYCSFB	ORC		ERRD-DD	ERRD-D	DRA
Surname	Kish	Hickey	Rotola	Guzman			LaPadula	Mugdan	Pavlou
Date	7/7/11	7/7/11	7/7/11	7/21/11	7/8			8/4/11	8/8/11

Office of Emergency Management Routing Slip - July 13, 2011

TO: (Name, office symbol, room number, building, agency/post)		Initials	Date
1.	**Tim Grier**	TG	7/13/11
2.	**Harriet McCollum**	HMc	7/13/11
3.	**Tito Irizarry**		7/13/11
4.	**Dana Tulis**		7/18/11
5.			
6.			
7.			
8.			

Description of Request	**Request for Signature**

REMARKS

Region 2 has requested concurrence on an Action Memorandum for a removal action where asbestos is the principal contaminant of concern. This is considered precedent-setting and, therefore, requires the concurrence of the OEM Director (non-concurrence is delegated to the OSWER AA). An earlier draft of the Action Memorandum was reviewed by OGC and approved. A yellow cover page with Earl Salo's mark is included in this package. This type of review does not require enforcement review. Don't hesitate to contact me if you have any questions.

From: (Name, org, symbol) Agency/Post)	Room No. Bldg	B517K
Tim Grier	Phone	202-564-2361

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
EPA
EMERGENCY RESPONSE

RECEIVED 7/14/11 #1057

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Date: June 20, 2011

Subject: Request for Concurrence on Proposed Nationally Significant or Precedent Setting Removal

From: Judith A. Enck
Regional Administrator

Thru: Walter E. Mugdan, Director
Emergency and Remedial Response Division

To: Dana S. Tulis, Acting Director
Office of Emergency Management

The purpose of this memorandum is to request your concurrence on the proposed removal action at the Charlestown Mall non-NPL Site, Village of Frankfort, Herkimer County, in New York. Re-delegation of Authority R-14-I-A gives you the authority to concur on nationally significant precedent-setting at non-NPL sites.

The On-Scene Coordinator (OSC) has discussed this proposed removal with staff of the Headquarters Program Operations and Coordination Division. The Emergency and Remedial Response Division has advised the OSC that this removal is considered nationally significant or precedent-setting because asbestos is the primary contaminant of concern, and pursuant to EPA policy, the Office of Emergency Management is to concur on this Action Memorandum since it qualifies as a nationally significant or precedent-setting removal action.

The Action Memorandum is attached for your review. My approval awaits your concurrence.

Concur:

[signature] for
Dana S. Tulis, Acting Director
Office of Emergency Management

Date: 7-18-11

According to the re-delegation authority, to non-concur remains with the Assistant Administrator, OSWER. If you choose not to concur on this action, please forward this memo to the Assistant Administrator.

Non-Concur:

Mathy Stanislaus, Assistant Administrator
Office of Solid Waste and Emergency Response

Date:

CONCURRENCES								
SYMBOL	OEM-POCD	OEM/POCD						
SURNAME	Grier	Lee						
DATE	7/12/11	7/13/11						

EPA Form 1320-1A (1/90) *Printed on Recycled Paper* **OFFICIAL FILE COPY**

☆ U.S. Government Printing Office: 2005 206-899 (mac)